OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

March 27, 1995

Re: General Motors Corporation (GMC)
Delco Chassis Division
U.S. EPA ID No.: OHD045557766
Ohio ID No.: 05-57-0273
Revised Hazardous Waste Permit

CERTIFIED MAIL

General Motors Corporation - Delco Chassis Division
Attn: Mr. Joseph Lininger
1435 Cincinnati Street
P.O. Box 1245
Dayton, Ohio 45401

Dear Mr. Lininger:

On September 28, 1994, you were issued a Revised Hazardous Waste Installation and Operation Permit in draft form in accordance with the requirements of Rule 3745-50-51 of the Ohio Administrative Code. Comments were received and a copy of the responsiveness summary regarding these comments is attached for your information.

Therefore, the enclosed revised hazardous waste permit is being issued to you today in final form. Please note that the revised permit remains in effect until such time as the Ohio Hazardous Waste Installation and Operation Permit is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 E. Town St., Room 300, Columbus, Ohio 43215.

Sincerely yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/dhs

cc: Edwin Lim, Mgr., RCRA Eng., DHWM
Sudhir Singhal, RCRA Eng., DHWM
Harriet Croke, U.S. EPA, Region V
Robert Brown, HWFB
Harold O'Connell, DHWM, SWDO
Chris Kotsko, DHWM, SWDO
Nancy Whetstone, Ohio EPA, Public Interest Center

perfinal(8)

OHIO ENVIRONMENTAL PROTECTION AGENCY

Revised Ohio Hazardous Waste Intallation and Operation Permit

Date of Issuance: March 27, 1995
Effective Date: March 27, 1995

US EPA ID No.: OHD 045 557 766
Ohio Permit No.: 05-57-0273

Name of Facility:	General Motors Corporation (GMC) Delco Chassis Division
Mailing Address:	1435 Cincinnati Street P.O. Box 1245 Dayton, Ohio 45401
Facility Location:	3100 Needmore Road Dayton, Ohio 45414
Person to Contact:	Joseph H. Lininger, Environmental Engineer

This Revised Ohio Hazardous Waste Installation and Operation Permit is issued pursuant and subject to Section 3734.05 (I) of the Ohio Revised Code and Rule 3745-50-51 of the Ohio Administrative Code.

The Ohio Hazardous Waste Installation and Operation Permit with the above referenced permit number as it may have been revised or modified prior to this date, is hereby incorporated by reference in its entirety except as it may be revised herein.

This revision of the permit shall remain in effect until such time as the Ohio Hazardous Waste Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.

The Permittee shall comply with all requirements of the revised Part B permit application as amended or supplemented by General Motors Corporation, Delco Chassis Division on October 28, 1991, January 6, 1994 and July 21, 1994. The information contained in the revised Part B permit application is incorporated herein by reference. Specifically, all written statements made by the applicant in the revised permit application are hereby incorporated as express, binding terms and conditions of this revised permit.

The Revised Terms and Conditions of this permit are attached hereto as Attachment I, and are incorporated herein by reference.

Donald R. Schregardus
Director

revper.gmc/SS.ao

ATTACHMENT I

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF HAZARDOUS WASTE MANAGEMENT

TERMS AND CONDITIONS

Name of Facility: General Motors Corporation, Delco Chassis Division
U.S. EPA ID No.: OHD 045 557 766
Ohio Permit No.: 05-57-0273

1. Moving the entrance of hazardous waste storage building from North side to East side:

   a) Within ten (10) working days after journalization of this permit, the Permittee shall submit to the Ohio EPA the time frames for moving the entrance of the hazardous waste storage building from the north side to the east side.

   b) The Permittee must inform the Ohio EPA, Southwest District Office contact person five (5) working days prior to the commencement of each activity outlined in the Work Plan (described in item 2 of this Condition) for completion of the project.

   c) The Permittee shall document each activity of the Work Plan.

   d) Within one hundred eighty (180) days after Journalization of this permit, the Permittee shall submit to Ohio EPA all relevant complete and detailed final design plans and drawings of the north wall and new entrance on the east side (including blueprints and materials of construction of all components) and an accompanying letter signed by the Permittee and an independent registered professional engineer stating that the units have been constructed in compliance with applicable rules, the conditions of this permit, the applicable state building codes and the approved application, by certified mail or hand delivery. If the plans submitted appear inconsistent with the conceptual plans contained in the approved application, such submittal may be considered by Ohio EPA as information constituting a permit change request requiring action of the Director pursuant to R.C. Chapter 3734, and the rules adopted thereunder.

2. Work Plan:

The following steps are involved for moving the entrance of the hazardous waste storage building from the north side to the east side:

Step 1 Cut an opening of dimensions 8' x 10' in the steel wall on the east side;

Step 2 Construct a 7' ramp from the outside of the curb at the bottom of the opening;

Step 3 Install steel gate to close the opening on the east side;

Step 4 Remove all fencing on the north side; and

Step 5 Drop the top steel wall to the ground and cover the top portion with light emitting plastic.

Responsiveness Summary for
General Motors Corporation Delco Chassis Division
OHD 045557766
05-57-0273

The Ohio EPA received a written comment from the General Motors Corporation Delco Chassis Division (Applicant) regarding the draft revised permit. The comment and the Ohio EPA's response are provided below:

Applicant's Comment:

"We have received your notice of the Draft Revised Ohio Hazardous Waste Installation and Operation Permit dated September 28, 1994. Our concern with the issuance of this permit is the time frame in which it will be issued. It appears this permit will be issued in November or December, and weather conditions may not allow Delco Chassis to start and complete this project within the terms and conditions of the revised permit.

Delco Chassis requests that we be allowed to postpone (if necessary, due to weather conditions) the start of this project. Our concern is the ability to pour concrete and have it cure at the proper outside ambient temperature, and employee exposure to winter conditions."

Ohio EPA Response:

Ohio EPA recognizes the need to change terms and conditions in the draft revised permit to accommodate any unforeseen problem. Therefore, condition 1(d) has been changed accordingly.

End of Responsiveness Summary

respsum.gmc/SS.ao

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

Donna

George V. Voinovich
Governor

Donald R. Schregardus
Director

CERTIFIED MAIL

September 30, 1991

FACILITY: GMC Delco Products
NOTICE OF DEFICIENCY C#/TA#4
OHIO ID: 05-57-0317
USEPA ID: OHD000817023

Brent Lang
GMC Delco Products
P.O. Box 1224
Mail Code F1-3
Dayton, Ohio 45401

Dear Mr. Lang:

Thank you for your March 20, 1991 response to Ohio EPA's Notice of Deficiency dated January 17, 1991.

The Ohio EPA Division of Hazardous Waste Management has conducted a completeness/technical adequacy review of your Part B application and has determined it to be incomplete and technically inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

We have enclosed completeness/technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 45 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is overstruck.

2. New language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be renumbered, table of contents revised, and complete sections provided as required.

042-28

Please send one copy each to:

Tom Crepeau
Ohio EPA, DHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V 5HR-13
230 South Dearborn Street
Chicago, Illinois 60604

Please send two copies to:

Harold O'Connell
Ohio EPA, Southwest District Office
40 South Main Street
Dayton, Ohio 45402

In the course of the technical adequacy review, we may request additional information if it is necessary to clarify, modify, or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the permit application, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.

We request that the facility contact Harold O'Connell, SWDO, at (513) 285-6357 within 10 days of receipt of this NOD to discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting. Thereafter, any questions concerning the review of this permit application and the level of detail expected, should also be addressed to the above mentioned person.

Sincerely,

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Hazardous Waste Management

cc: Lisa Pierard, U.S. EPA
Joel Morbito, U.S. EPA
Tehmton Toorkey, CO, DHWM, Ohio EPA
Alan Harness, CO, DHWM, Ohio EPA
Pam Allen, CO, DHWM, Ohio EPA
Harold O'Connell, SWDO, DHWM, Ohio EPA
Central File

PART B REVIEW COMMENTS
GMC DELCO PRODUCTS-DAYTON
OHD 000 817 023
05-57-0317

COMPLETENESS COMMENTS

C. WASTE CHARACTERISTICS

1. C-1 Chemical and Physical Analyses:
OAC 3745-54-13(A)(1); OAC 3745-50-44(A)(2)

Provide laboratory report detailing the chemical and physical analyses performed for those F027 wastes proposed for storage at the facility.

D. PROCESS INFORMATION

2. D-2a(4) Ignitable Wastes
OAC 3745-50-44(C)(2)(j); 54-17(B); 55-98; 55-99

a) Provide data on the operating pressures and temperatures experienced during routine operation of the #2 hazardous waste tank system.

b) Provide demonstration of compliance with all applicable provisions contained in National Fire Protection Association (NFPA) Codes, included, but not limited to the following sections within NFPA 30:

Normal Venting for Aboveground Tanks

(2-2.4.2)
Demonstrate that the venting system design of the #2 tank is sized in accordance with either one of the following standards; 1) American Petroleum Institute (API) Standard No. 2000; "Venting Atmospheric and Low Pressure Storage Tanks", 1982; or 2) other accepted standard; or shall be at least as large as the filling or withdrawal connection, whichever is larger, but in no case less than 1 1/4" (3cm) nominal inside diameter.

(2-2.4.3)
Demonstrate that the design of the #2 tank system incorporates preventative measures to prohibit overpressurization of the tank by a pump discharging into the tank when such pressure is capable of exceeding the design pressure of the tank.

(2-2.4.4)
Since the #2 tank possesses multiple fill and withdrawal connections where simultaneous fill or withdrawal can occur, demonstrate that the designed vent size is based upon the maximum anticipated simultaneous flow.

Emergency Relief Venting for Fire Exposure for Aboveground Tanks

(2-2.5.4)
Where the entire dependency for emergency pressure relief is placed upon pressure-relieving devices, demonstrate that the installed vent is of sufficient design in order to prevent rupture of the shell or bottom of the tanks.

Electrical Equipment

(5-3.5)
Specify if all electrical equipment and wiring is of type specified and has been installed in accordance with NFPA 70, National Electrical Code (see NFPA 30; 5-3.5.3). In addition, demonstrate that the classification of all areas in the plant for the purpose of installing electrical equipment has been conducted in accordance with Table 5-5.3 of NFPA 30.

Loading and Unloading Operations

(5-4.4)
Review of the valve configuration on the #2 tank system indicates that blended wastes are off-loaded to tank vehicles for transport to off-site disposal facilities. Provide demonstration that all applicable provisions within NFPA 30; 5-4.4.1 will be addressed in the design and operation of this system.

3. D-2b(1) Assessment of Existing Tank System's Integrity
OAC 3745-50-44(C)(2)(a); 55-91

GENERAL COMMENT: The ability of GMC-Delco Dayton facility representatives to address those comments contained within will determine the adequacy of the existing secondary containment system in meeting the requirements of OAC 3745-55-93. If it is determined that any of the components within this structure do not conform such requirements, then the following assessment is mandated by OAC 3745-50-91.

Provide a written assessment that has been reviewed and certified by a independent, qualified, registered professional engineer (P.E.) on the structural integrity and suitability of the #1 and #2 tank systems. The assessment should be accompanied by all supporting information supplied to the P.E. in his/her

examination of the following considerations associated with the design and operation of the hazardous waste tank systems:

a) Design standard(s) according to which the tank and associated ancillary equipment were constructed.

b) Legible copies of shop drawings or construction blueprints to provide specific information on the tank system being reviewed against the specified design standard.

c) Hazard characteristics of the waste to be managed within the system.

d) Design considerations to ensure that:

i) the foundation will maintain the load of a full tank;
ii) the system will withstand the effects of frost heave.

e) a description of the materials and equipment utilized to provide for external corrosion protection.

f) the results of a leak test, internal inspection, or other tank integrity examination.

4. D-2d(2) Requirements for Tank Systems until Secondary Containment is Implemented
OAC 3745-50-44(C)(2)(g); 55-93(i)

If determined applicable, stipulate those procedures to be utilized for ensuring that the integrity assessments for the tank systems will occur annually until secondary containment requirements apply, as projected in 1997.

TECHNICAL ADEQUACY

A. PART A APPLICATION

1. Indicate the process code for the type of storage vessel to be utilized for storage of F027 hazardous wastes.

2. D-1a(3)(a) Requirement for Base or Liner to Contain Liquids
OAC 3745-50-44(C)(1)(a); 55-75(B)(1)

a) Provide an engineering evaluation of the structural integrity of the foundation or base situated beneath the hazardous waste storage area and associated secondary containment system,

including condsideration of the underground 2,000 gallon emergency tank.

b) Demonstrate that the secondary containment system, associated with the container storage and tank systems, is lined with an impermeable coating which is compatible with all wastes stored within these areas. In addition, if joints are present within the base and walls of the system, demonstrate whether these have been fitted with chemical resistant water stops.

c) Provide information on any integrity assessments which have been conducted upon the 2,000 gallon underground tank and all piping connecting this tank to the aboveground portions of the associated secondary containment structure. Include information on the "rainwater release valve" (e.g., type of valve; ability to prohibit migration of liquids; previous integrity assessments).

d) Provide information on the conditions which would prompt facility representatives to open any of the valves associated with the secondary containment system's "rainwater release valves", as identified on Figure D-4 of the permit application.

3. D-1a(3)(e) Removal of Liquids from the Containment Systems.
OAC 3745-50-44(C)(1)(a)(V); 55-75(B)(5)

a) Revise narrative on page D-5 of the application to stipulate that any spills and/or releases of hazardous waste to the secondary containment system will prompt facility officials within twenty-four (24) hours to remove the contents of the 2,000 gallon underground emergency tank.

b) List all informational resources reviewed prior to conducting analyses upon those liquids removed from the secondary containment system (e.g., daily pad inspection log, MSDS, etc.). Analyses must encompass all constituents present within listed wastes managed at the pad area when leaks, spills and or releases have occurred.

4. D-2a(2) Description of Feed and Bypass Systems, Safety Cutoffs, and Pressure Controls.
OAC 3745-50-44(C)(2)(c); 55-94(B)

a) Provide specific information on all valves, pumps, and agitators associated with the hazardous waste tank systems (e.g., type of valve, manufacturer's specifications sheet for agitator).

b) Describe the type of lock-out mechanism incorporated within the design of the #2 tank system to prohibit the introduction of additional hazardous wastes, pending analytical confirmation of

the identity of the existing contents of the tank.

5. D-2d(1)(b) Requirements for Secondary Containment & Leak Detection
OAC 3745-50-44(C)(2)(g); 55-93(B)

a) Provide calculations to substantiate that the foundation of the secondary containment structure for the hazardous waste tank systems is capable of providing support, resistance to pressure gradients (from forces both above and below the system), as well as able to prevent system failure due to compression or up-lift.

b) Provide structural analysis of impact which supporting legs of the #2 tank system present upon the existing foundations integrity. Such analysis must clearly demonstrate that bearing capacity of foundation is sufficient to sustain overlying bearing load exerted by tank system.

c) Document how it will be ensured that leaked and/or spilled wastes or precipitation, or any combination of these, will be removed from the secondary containment structures within the 24 hour maximum timeframe, as required.

6. D-2d(1)(c) Requirements for External Liner Systems
OAC 3745-50-44(C)(2)(g); 55-93(D) thru (E)

a) Provide calculations to demonstrate that the secondary containment structure for the hazardous waste storage tank system is of sufficient capacity to contain the volume of precipitation experienced from a 24 hour-25 year rainfall event, in addition to the volume of the largest tank within the system.

b) Provide demonstration of the ability of the secondary containment structure to contain lateral overspray and prohibit the migration of hazardous wastes to areas adjacent to, yet outside of, the secondary containment structure. Calculations should account for maximum trajectory of wastes realized from a leak in the tank system at a distance halfway up the vertical tank shell. Demonstration must incorporate consideration of overspray potential for all ancillary equipment within the system. Incorporate provisions for installation of overspray protection devices (e.g., tank jacketing, deflection shielding) where potential likelyhood of overspray exists.

7. D-2d(1)(d) Secondary Containment and Leak Detection Requirements for Ancillary Equipment
OAC 3745-50-44(C)(2)(9); 55-93(F)

a) reference above comment #6b.

b) Present calculations to substantiate that the secondary

containment system is situated upon a foundation or base that is:

i) capable of providing support;

ii) resistant to pressure gradients experienced from both above, as well as below the system; and

iii) capable of preventing failure of the overlying system due to settlement, compression, or uplift.

c) Demonstrate that the vault system was constructed using chemical resistant water stops in place at all joints. Specify materials used.

d) Demonstrate that all interior surfaces of the above ground portion of the secondary containment structure, as well as the underground vault and associated connections have been provided with an impermeable coating which is compatible with all wastes and/or materials. Specify coating used and supply manufacturer's information data sheets.

I. CLOSURE PLAN FINANCIAL REQUIREMENTS

8. I-4 Closure Cost Estimate
OAC 3745-55-42

The September, 1990 estimate is not enough to demonstrate compliance with OAC 3745-55-42. For instance, it is not clear whether the estimate reflects final disposal (not recycle or reuse), whether disposal costs include costs for disposal of each type of waste in storage in the containers and tanks, whether it includes third-party closure costs, and if it reflects the most expensive closure scenario. For purposes of calculating and maintaining a cost estimate, GMC Delco Dayton representatives cannot rely on there being a market for reuse or recycle of its hazardous waste and therefore calculate it's estimate based on this future market. The estimate and costs for disposal must be based on the most expensive closure scenario.
Also, this rule requires that the estimate be updated within thirty days after the close of the firm's latest fiscal year whether December 31, 1990 or January 30, 1991. Therefore, the September, 1990 estimate should not be the most recent for the facility and is therefore outdated.

9. I-5e Financial Test for Closure
OAC 3745-55-43

The March 30, 1989 mechanism contained in the application is

outdated and consequently does not meet the wording requirements of OAC 3745-55-51. A current copy of the mechanism, meeting the requirements of OAC 3745-55-43(F), including the wording requirements of OAC 3745-55-51(G), must always be maintained in the Part B application.

10. I-8a(2) Financial Test for Liability Coverage
OAC 3745-55-47

The March 30, 1989 mechanism contained in the application is outdated and consequently does not meet the current wording requirements of OAC 3745-55-51. A current copy of the mechanism, meeting the requirements of OAC 3745-55-43(F), including the wording requirements of OAC 3745-55-51(G), must always be maintained in the Part B application.

PART B CERTIFICATION

11. L Certification Statement
OAC 3745-50-42

Provide the signature of the principal executive officer of the corporation on the certification statement supplied within the permit application.

DAMES & MOORE A PROFESSIONAL LIMITED PARTNERSHIP
644 LINN STREET, SUITE 501, CINCINNATI, OHIO 45203 (513) 651-3440

December 31, 1991

State of Ohio Environmental Protection Agency
P.O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Attention: Mr. Tom Crepeau
Division of Hazardous Waste Management

Gentlemen:

Re: General Motors Corporation
Delco Chassis Dayton Operations
(formerly Delco Products)
RCRA Part B Permit Application
U.S. EPA ID: OHD 000817023
Ohio ID: 05-57-0317

On behalf of the General Motors Corporation (GMC) and Delco Chassis Dayton Operations (formerly Delco Products), Dames & Moore is submitting this letter indicating that GMC Delco Chassis plans to withdraw its Part B Permit Application, effective immediately. A Closure Plan for its hazardous waste management facility (HWMF) will be submitted within the first part of 1992.

Based on Dames & Moore's telephone conversations with the Ohio EPA and U.S. EPA Region V on December 12, 13, 16, 17, and 19, GMC Delco Chassis will remain as a generator of hazardous waste, and following closure, will store hazardous waste on a less than 90-day basis.

If you have any questions or comments regarding this matter, please direct them to Mr. Brent Lang at GMC Delco Products - (513) 455-3081.

Very truly yours,

DAMES & MOORE

Linda E. Edwards
Associate

LEE:GM(1)/122mh
00299-198-122

copy: Harold O'Connell - SWDO
Lisa Pierard - U.S. EPA Region V

455-3121

04/2-29

A.T. Kearney, Inc.
One Lagoon Drive
Redwood City, California 94065
415 595 4300
Facsimile 415 595 5659

Management
Consultants

A.T. KEARNEY

October 25, 1991

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V, 5HR-JCK-13
230 South Dearborn Street
Chicago, IL 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R05-17-03; Facility-Specific Enforcement Checklist for GMC Dayton; Draft Deliverable

Dear Mr. Orenstein:

Enclosed is the draft deliverable of the permit-specific enforcement checklist for the General Motors Corporation, Dayton, in accordance with the above-referenced work assignment.

The format for this checklist is based upon the model checklist developed by Metcalf and Eddy. This checklist follows the procedures and formats of the model checklist. Please note that we have used a different numbering system for this checklist as the permit was structured very different from the model checklist.

Please feel free to call me if you have any questions.

Sincerely,

OHD 000 817 023

Monica B. Roll
Technical Director

51703DD.LTR

Enclosures

cc: B. Wesley, EPA Region V
D. Heller, EPA Region V
A. Glazer
L. Poe
J. Dreith
M. Greenwood
L. Sherman
B. Smith

GENERAL MOTORS CORPORATION
DAYTON PLANT (INLAND DIVISION)
EPA I.D. NO. OHD000817023

PERMIT-SPECIFIC INSPECTION CHECKLIST

FACILITY LOCATION:	2701 Home Avenue Dayton, Ohio
MAILING ADDRESS:	
TELEPHONE:	
FACILITY CONTACT:	

PERMITTED ACTIVITIES:	Storage in containers not to exceed 2,500 gallons; Storage in tanks not to exceed 7,500 gallons
PERMITTED WASTES:	Tanks - F002, F003, F005, D006, D007, D008 Containers - D001, D008, F002, U223
SIC CODE:	

	Name	**Title**	**Affiliation**	**Phone**
INSPECTORS:				
FACILITY PERSONNEL:				

INSPECTION DATE:		**INSPECTION TIME:**	

GMC DAYTON - EPA I.D. NO. OHD000817023

I. STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

GMC Dayton is not allowed to store, treat or dispose of hazardous wastes in the following ways: storage in waste piles, or surface impoundments; treatment or disposal of any kind. Are any of these prohibited waste management practices employed by the facility? (I.A.)

Yes _____ No _____

If yes, note unpermitted activities: _____

_____

I.B. PERMIT ACTIONS

No questions required. (I.B)

I.C. SEVERABILITY

No questions required. (I.C)

I.D. DUTIES AND REQUIREMENTS

I.D.1. DUTY TO COMPLY

If GMC Dayton has stored, treated, or disposed of a hazardous waste not covered by their permit, did they obtain an emergency permit in accordance with 40 CFR 270.61? (I.D.1.)

Yes _____ No _____ N/A _____

If yes, note circumstances: _____

_____

I.D.2. DUTY TO REAPPLY

Has GMC Delco's permit reached the expiration date of September 23, 1993? (I.D.2)

Yes _____ No _____

I.D.3. PERMIT EXPIRATION

If GMC Dayton has operated under an expired permit, did they submit a permit application at least 180 days before the expiration date? (I.D.3.)

Yes _____ No _____ N/A _____

Comments: _____

_____

I.D.4. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

No questions required. (I.D.4)

I.D.5. DUTY TO MITIGATE

In the event of noncompliance with the permit, did GMC Dayton take all reasonable steps to minimize or correct any adverse impact(s) on the environment? (I.D.5)

Yes _____ No _____ N/A _____

Describe any noncompliance/mitigation events: _____

_____

I.D.6. PROPER OPERATION AND MAINTENANCE

No questions required. (I.D.6)

I.D.7. DUTY TO PROVIDE INFORMATION

Has GMC Dayton furnished to the Regional Administrator, within a reasonable time after his request, information which may be relevant to modifying, revoking, reissuing, or determining compliance with the permit, or copies of records required to be kept by the permit? (I.D.7)

Yes _____ No _____ N/A _____

If yes, note circumstances: _____

_____

I.D.8. INSPECTION AND ENTRY

If requested, has GMC Dayton allowed the Regional Administrator or an authorized representative, upon presentation of credentials and other documents required by law, to at reasonable times:

a. Enter facility premises where regulated activities and permit required records are located? (I.D.8.a)

Yes _____ No _____ N/A _____

b. Have access to and copy any permit required records? (I.D.8.b)

Yes _____ No _____ N/A _____

c. Inspect facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit? (I.D.8.c)

Yes _____ No _____ N/A _____

d. Sample or monitor any substances or parameters to ensure permit compliance or as otherwise authorized by RCRA? (I.D.8.d)

Yes _____ No _____ N/A _____

Describe denial of access circumstances: _____
_____
_____

I.D.9. MONITORING AND RECORDS

a. The following practices should be occurring at GMC Dayton with respect to sampling for the purpose of monitoring:

i. Are samples and measurements taken for the purpose of monitoring representative of the monitored activity? (I.D.9.a)

Yes _____ No _____ N/A _____

ii. Is the method used to obtain a representative sample of the waste to be analyzed an appropriate method from Appendix I of 40 CFR Part 261? (I.D.9.a)

Yes _____ No _____ N/A _____

iii. Are laboratory methods used those specified in either Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, June 1982; Standard Methods for the Examination of Water and Wastewater, 1980; or an equivalent method as specified in the facility's Waste Analysis Plan? (I.D.9.a., Attachment II)

Yes _____ No _____ N/A _____

b. Has GMC Dayton maintained monitoring records, for t least three (3) years from the date of sample, measurement, report or record, which include the following:

i. Monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation? (I.D.9.b)

Yes _____ No _____

ii. Copies of reports and records required by their permit? (I.D.9.b)

Yes _____ No _____

iii. Records of all data used to complete the RCRA permit application? (I.D.9.b)

Yes _____ No _____

c. Do all records of monitoring information specify the following:

i. The date(s), exact place(s), and time(s) of sampling or measurement? (I.D.9.c)

Yes _____ No _____

ii. The individual(s) who performed the sampling or measurement? (I.D.9.c)

Yes _____ No _____

iii. The date(s) analyses were performed? (I.D.9.c)

Yes _____ No _____

iv. The individual(s) who performed the analyses? (I.D.9.c)

Yes _____ No _____

v. The analytical techniques or methods used? (I.D.9.c)

Yes _____ No _____

vi. The results of such analyses? (I.D.9.c)

Yes _____ No _____

Note any irregularities in monitoring activities or

records retention: _____
_____
_____
_____

I.D.10. **REPORTING PLANNED CHANGES**

If there have been any physical alterations or additions to the permitted facility, did GMC Dayton notify the Regional Administrator as soon as possible during the planning stage? (I.D.10)

Yes _____ No _____ N/A _____

Note any physical alterations or additions: _____
_____

I.D.11. **CERTIFICATION OF CONSTRUCTION OR MODIFICATION**

a. The following condition must have been met prior to storage of hazardous wastes in modified or newly constructed storage areas:

i. Did GMC Dayton submit a letter to the Regional Administrator by certified mail or hand delivery, which was signed by GMC Dayton and a registered professional engineer, stating that the material handling and storage area was constructed or modified in compliance with the permit? (I.D.11.a)

Yes _____ No _____ N/A _____

b. **AND** one of the following conditions must also have been met:

i. Did the Regional Administrator inspect the modified or newly constructed material handling and storage area and find it to be in compliance with the permit? (I.D.11.b.i)

Yes _____ No _____ N/A _____

OR

ii. Did the Regional Administrator either waive the inspection or not notify GMC Dayton within fifteen days of the intention to inspect? (I.D.11.b.ii)

Yes _____ No _____ N/A _____

Section I.D.11. Comments: _____
_____
_____

I.D.12. **ANTICIPATED NONCOMPLIANCE**

If GMC Dayton is planning any changes in the permitted facility or activities which potentially could result in noncompliance with the permit, has advance notice been given to the Regional Administrator? (I.D.12)

Yes _____ No _____ N/A _____

Note any such planned changes: _____

_____

I.D.13. **TRANSFER OF PERMITS**

If ownership or operation of the facility was transferred during its operating life, did GMC Dayton notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270? (I.D.13)

Yes _____ No _____ N/A _____

Note any changes in ownership: _____

_____

I.D.14. **COMPLIANCE SCHEDULES**

Have all reports of compliance or noncompliance with, or any progress reports on, interim or final requirements contained in the compliance schedule of the permit been submitted within fourteen days of the individual schedule dates? (I.D.14)

Yes _____ No _____ N/A _____

Comments: _____

_____

I.D.15. **TWENTY-FOUR HOUR REPORTING**

If noncompliance with their permit has resulted in endangerment of health or the environment, has GMC Dayton orally reported the following to the Regional Administrator within twenty-four hours of becoming aware of the circumstances? (I.D.15)

Yes _____ No _____ N/A _____

If yes, did the oral report contain the following:

a. Information on any release of hazardous waste which may have endangered public drinking water supplies? (I.D.15.a)

Yes _____ No _____ CD _____ N/A _____

b. Information on a release or discharge of hazardous waste or a fire or explosion from the facility which could threaten human health or the environment outside the facility property? (I.D.15.b)

Yes _____ No _____ CD _____ N/A _____

If no, CD or N/A, go to checklist section I.D.16. (CD = could not be determined)

If yes, did the oral report include the following:

i. Name, address, and telephone number of the owner/operator? (I.D.15.b.i)

Yes _____ No _____

ii. Name, address, and telephone number of the facility? (I.D.15.b.ii)

Yes _____ No _____

iii. Date, time, and type of incident? (I.D.15.b.iii)

Yes _____ No _____

iv. Name and quantity of material(s) involved? (I.D.15.b.iv)

Yes _____ No _____

v. The extent of the injuries, if any? (I.D.15.b.v)

Yes _____ No _____ N/A _____

vi. Assessment of actual/potential hazard to human health and the environment outside the facility property? (I.D.15.b.vi)

Yes _____ No _____ N/A _____

vii. Estimated quantity and disposition of recovered materials? (I.D.15.b.vii)

Yes _____ No _____

c. Was a written report submitted within five days of the time GMC Dayton became aware of the circumstances, or fifteen days if allowed by the Regional Administrator? (I.D.15)

Yes _____ No _____ N/A _____

If no or N/A, go to checklist section I.D.16.

If yes, did the report contain the following:

i. A description of the noncompliance and its cause? (I.D.15)

Yes _____ No _____

ii. The period(s) of noncompliance, including exact dates and times? (I.D.15)

Yes _____ No _____

iii. Whether the noncompliance has been corrected, or the anticipated time the noncompliance would continue? (I.D.15)

Yes _____ No _____

iv. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance? (I.D.15)

Yes _____ No _____

Section I.D.15. Comments: _____

_____

_____

I.D.16. OTHER NONCOMPLIANCE

If there have been other instances of noncompliance not reported in A.18. above, have these instances been reported at the time monitoring reports were submitted? (I.D.16)

Yes _____ No _____ N/A _____

Describe any noncompliance events: _____

_____

I.D.17. OTHER INFORMATION

If GMC Dayton became aware that relevant information was not submitted in the permit application, or that incorrect information was submitted in either the permit application or reports, was such information forwarded to the Regional Administrator? (I.D.17)

Yes _____ No _____ N/A _____

Note any data gaps not reported: _____

_____

I.E. SIGNATORY REQUIREMENT

Have all reports or other information requested by the Regional Administrator been signed and certified in accordance with 40 CFR 270.11? (I.E)

Yes _____ No _____ N/A _____

Comments: _____

_____

I.F. CONFIDENTIAL INFORMATION

No questions required. (I.F)

I.G. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The Permittee is required to maintain certain documents and amendments, as well as revisions and modifications to these documents, until closure of the facility is completed and certified. Are the following documents maintained at the facility:

1. Waste Analysis Plan? (I.G.1)
   Yes _____ No _____

2. Personnel training documents and records? (I.G.2)

   Yes _____ No _____

3. Contingency Plan? (I.G.3)

   Yes _____ No _____

4. Closure Plan? (I.G.4)

   Yes _____ No _____

5. Cost estimate for facility closure? (I.G.5)

   Yes _____ No _____

6. Operating record? (I.G.6)

   Yes _____ No _____

7. Inspection schedule? (I.G.7)

   Yes _____ No _____

ADDITIONAL SECTION I. COMMENTS: _____

_____

_____

II. GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

Note: Emphasis in the following question is on overall facility activities. It may be assessed most effectively after the inspection is complete.

Does GMC Dayton maintain and operate the facility so as to minimize the possibility of fire, explosion, and any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water, which could threaten human health or the environment? (II.A)

Yes _____ No _____

Comments: _____

_____

II.B. REQUIRED NOTICE

1. Did GMC Dayton notify the Regional Administrator, in writing at least four weeks in advance, of the date GMC Dayton expects to receive hazardous waste from the GMC Vandalia plant? (II.B.1)

Yes _____ No _____ N/A _____

2. Prior to accepting waste from the GMC Vandalia plant (Inland), has the Permittee informed the generator in writing that GMC Dayton has the appropriate permits for, and will accept, the waste the generator is shipping; and the Permittee has kept a copy of this written notice as part of the operating record? (II.B.2)

Yes _____ No _____ N/A _____

II.C. GENERAL WASTE ANALYSIS

1. SAMPLING REQUIREMENTS

a. Are waste streams accepted only from the GMC Vandalia plant? (II.C., Section IV of Attachment II)

Yes _____ No _____

If waste streams were accepted from other sources, describe the discrepancy: _____

_____

b. General Waste Analysis Procedures for Incoming Shipments

i. Are all wastes generated by GMC Dayton and GMC Vandalia, that are designated for treatment, storage, or disposal, evaluated by the Environmental Engineering personnel to determine if waste samples should be obtained for detailed chemical and physical analysis? (II.C., Section I.A. of Attachment II)

Yes _____ No _____ C/D _____

Comment: _____

_____

ii. Does the Waste Management Supervisor notify Environmental Engineering when he or she has reason to believe that the generated waste composition has changed, or they have an "unknown" waste material? (NOTE: An unknown waste material is one that has not been previously characterized.) (II.C., Section I.A of Attachment II)

Yes _____ No _____ C/D _____

Comment: _____

_____

iii. Does Environmental Engineering maintain and distribute a list of waste material that has been characterized? (II.C., Section I.A. of Attachment II)

Yes _____ No _____ C/D _____

2. SAMPLING RESPONSIBILITY

a. Does Tim Wojdacz, Supervisor of Environmental Engineering, obtain samples of the waste material, submit them to an approved testing lab, and evaluate the results? (II.C., Section I.B. of Attachment II)

Yes _____ No _____ C/D _____

3. SAMPLING METHODS

a. Are the following methods used for sampling the following types of waste materials? (II.C., Section I.C. of Attachment II)

Waste Type	Sampling Method		
Extremely Viscous Liquid	ASTM Standard D140-70	Yes___	No___
Crushed or Powdered Material	ASTM Standard D346-75	Yes___	No___
Soil or Rock-like Material	ASTM Standard D420-69	Yes___	No___
Fly Ash-like Material	ASTM Standard D2234-76	Yes___	No___
Containerized Liquid Wastes	"Coliwasa - Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" U.S. EPA	Yes___	No___

b. Has the facility used any new and/or alternative methods, instead of any of the above methods and did they obtain EPA approval for the substitution? (II.C., Section I.C. of Attachment II)

Yes _____ No _____

If yes, please specify method(s): _____

_____

_____

4. SAMPLING FREQUENCY

a. Are all "unknown" waste materials sampled and characterized when they are delivered to the Waste Management area for storage and/or disposal? (NOTE: An unknown waste material is one that has not been previously characterized.) (II.C., Section I.D. of Attachment II)

Yes _____ No _____ C/D _____

Comment: _____

_____

b. Is the analysis for specific waste materials repeated if the process generating the waste has changed? (II.C., Section I.D. of Attachment II)

Yes _____ No _____ C/D _____

Comment: _____

c. Is the analysis for specific waste materials repeated if an analysis by the disposal contractor does not match GMC Dayton's original analysis? (II.C., Section I.D. of Attachment II)

Yes _____ No _____ C/D _____

Comment: _____

d. Is analytical data reviewed on an annual basis and a determination made as to which waste materials requiring repeat analysis? (II.C., Section I.D. of Attachment II)

Yes _____ No _____ C/D _____

Comment: _____

5. SELECTION OF PARAMETERS

a. Are wastes classified as liquids analyzed for the following: (II.C., Section II.A.1 of Attachment II)

A.	pH (S.U.)	Yes___	No___
B.	Physical State	Yes___	No___
C.	Flash Point	Yes___	No___
D.	Viscosity (centistokes)	Yes___	No___
E.	Vapor pressure	Yes___	No___
F.	Specific gravity	Yes___	No___
G.	Heating value (Btu/lb)	Yes___	No___
H.	Layers	Yes___	No___
I.	Total solids	Yes___	No___
J.	Ash content	Yes___	No___
K.	Total cyanide	Yes___	No___
L.	Free cyanide	Yes___	No___
M.	Sulfate	Yes___	No___
N.	Chloride	Yes___	No___
O.	Heavy metals (silver, arsenic, barium, cadmium, copper, mercury, nickel, lead, selenium, zinc)	Yes___	No___

b. Are solid and semi-solids analyzed for the preceding, except those which do not apply to solid or semi-solid materials? (II.C., Section II.A.2 of Attachment II)

Yes _____ No _____ N/A _____

c. Are materials which are suspected of containing PCB's analyzed for PCB content? (II.C., Section II.A.3 of Attachment II)

Yes _____ No _____ N/A _____

d. Are materials which are suspected of being E.P. toxic analyzed according to the EPA E.P. toxicity test? (II.C., Section II.A.3 of Attachment II)

Yes _____ No _____ N/A _____

6. TEST METHODS

Are the methods listed in Attachment I used in testing for the preceding parameters? (II.C., Section II.C of Attachment II)

Yes _____ No _____

7. EVALUATION OF TEST RESULTS

a. Does Environmental Engineering review the materials and processes used in generating the waste material? (NOTE: This information will be used and checked against Subpart D of 40 CFR 261 to determine if the generated waste is a listed hazardous waste. If the waste material is a listed hazardous waste, the analytical data will be reviewed and will either become part of the background data or be used to justify possible de-listing studies.) (II.C., Section III.A of Attachment II)

Yes _____ No _____ C/D _____

b. If the waste material is not a hazardous waste, is criteria under Subpart C of 40 CFR 261 reviewed in order to characterize the waste material? (NOTE: The characteristics are ignitability, corrosivity, reactivity, and E.P. toxicity.) (II.C., Section III.B of Attachment II)

Yes _____ No _____ C/D _____

c. If disposal requirements for waste materials change, is the waste analysis plan reviewed and necessary revisions instigated? (II.C., Section III.C of Attachment II)

Yes _____ No _____ C/D _____ N/A _____

8. ADDITIONAL REQUIREMENTS FOR WASTES GENERATED OFFSITE

a. Are drums of waste shipped to GMC Dayton from GMC Vandalia manifested and labeled as required for interstate shipment? (II.C., Section IV of Attachment II)

Yes _____ No _____ C/D _____

b. Is the General Waste Analysis and Sampling plan developed for wastes generated on-site applied to wastes generated off-site? (II.C., Section IV of Attachment II)

Yes _____ No _____ C/D _____

Section II.C. comments: _____
_____
_____
_____

II.D. SECURITY

1. Does GMC Dayton have a twenty-four hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? (II.D, 264.14(b))

Yes _____ No _____

2. If no, does the facility have the following:

a. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? (II.D, 264.14(b))

Yes _____ No _____ N/A _____

AND

b. A means to control entry, at all times, through the gates or other entrances, to the active portion of the facility? (II.D, 264.14(b))

Yes _____ No _____ N/A _____

3. Are there signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations, in sufficient numbers to be seen from any approach to the active portion of the facility? (II.D, 264.14(c))

Yes _____ No _____

Section II.D. Comments: _____

_____

_____

II.E. GENERAL INSPECTION REQUIREMENTS

1. Does GMC Dayton follow the inspection schedule in Attachment II of this checklist? (II.E)

Yes _____ No _____

If no, explain: _____

_____

2. If deterioration or malfunctions were discovered during an inspection, were they remedied to prevent either an environmental or human health hazard? (II.E, 264.15(c)., Section F-2a of Attachment III)

Yes _____ No _____

3. If a hazard was imminent, or had already occurred (due to deterioration/malfunction) was remedial action taken immediately? (II.E, 264.15(c), Section F-2a of Attachment III)

Yes _____ No _____

4. Has the Permittee retained all inspection records for at least three years from the dates of inspection? (II.E, 264.15(d), Section F-2d of Attachment III)

Yes _____ No _____

5. If daily inspection logs are available, do they contain the following: (II.E, 264.15(d), Section F-2b(1) of Attachment III)

Inspector's name and title	Yes ___	No ___	
Date and time of inspection	Yes ___	No ___	
Item of inspection	Yes ___	No ___	
Problems encountered	Yes ___	No ___	N/A ___
Date and nature of repairs or other remedial actions	Yes ___	No ___	N/A ___

If no, explain: _____

_____

II.F. PERSONNEL TRAINING

Note: Hazardous waste training at GMC Dayton is based upon the following document, which should be available to the inspector at the facility: "Personnel Training Program".

1. Is the training program directed by a person trained in hazardous waste management procedures? (II.F, 264.16(a)(2))

Yes _____ No _____

Note any deficiencies: _____
_____

2. Does personnel training include, at a minimum, the following: (II.F)

a. Procedures for locating information and understanding the nature of chemical information and potential hazards? (II.F, 264.16(a)(3))

Yes _____ No _____

b. Instruction on the chemical properties of flammability, ignitability, toxicity, explosivity, corrosivity or reactivity materials? (II.F, 264.16(a)(3))

Yes _____ No _____

c. Classification of hazardous materials and wastes by the "C&R Safety and Health Index System"? (II.F, 264.16(a)(3))

Yes _____ No _____

d. Identification and instruction of hazardous waste handling, treatment, storage and disposal requirements? (II.F, 264.16(a)(3))

Yes _____ No _____

e. Health effects of chemical handling, the effect of toxic material and how to obtain additional information? (II.F, 264.16(a)(3))

Yes _____ No _____

f. Information on the selection and limitations of personnel protective equipment, including respirator protection? (II.F, 264.16(a)(3))

Yes _____ No _____

Section II.F.2. Comments: _____
_____
_____

3. Does the emergency response portion of the personnel training include, at a minimum, the following: (II.F)

a. Response to fire and/or explosions? (II.F, 264.16(a)(3)(i))

Yes _____ No _____

b. Response to spills and procedures for containment and control? (II.F)

Yes _____ No _____

c. Emergency communication procedures and alarm systems? (II.F, 264.16(a)(3))

Yes _____ No _____

d. Procedures for locating and using facility emergency equipment? (II.F, 264.16(a)(3)(i))

Yes _____ No _____

Section II.F.3. Comments: _____

_____

4. Do facility personnel receive the appropriate level of training in hazardous waste handling within six months of hire? (II.F, 264.16(b), Section H-2 of Attachment IV)

Yes _____ No _____

If no, explain: _____

_____

5. Have employees ever worked alone or without supervision prior to completion of training? (II.F, 264.16(b))

Yes _____ No _____

If yes, explain: _____

_____

6. Do GMC Dayton employees meet annually for review and update of the training program? (II.F, 264.16(c), Section H-2 of Attachment IV)

Yes _____ No _____

Section B.6.f. Comments: _____

_____

7. Are the following documents and records maintained at the facility as required by 40 CFR 264.16(d)(1-3)?: (II.F)

a. Records documenting the job title for each position and name of employee filling each position? (II.F, 264.16(d)(1), Section H-2 of Attachment IV)

Yes _____ No _____

b. Records documenting the job description for each position? (II.F, 264.16(d)(2), Section H-2 of Attachment IV)

Yes _____ No _____

c. Records documenting the type and amount of both introductory and continuing training that is given to each appropriate employee? (II.F, 264.16(d)(3), Section H-2 of Attachment IV)

Yes _____ No _____

d. Records documenting that the training (both introductory and review) required has been given to, and completed by, facility personnel? (II.F, 264.16(d)(4), Section H-2 of Attachment IV)

Yes _____ No _____

e. Are training records on current personnel kept on-site (until closure of the facility), and training records on former employees kept for at least three years from the date of the individual's termination? (II.F, 264.16(d)(5), Section H-2 of Attachment IV)

Yes _____ No _____

Section II.F.7. Comments: _____

_____

II.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

1. The owner or operator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste, therefore the following precautions should be occurring:

a. Are ignitable and reactive wastes appropriately separated and protected from sources of ignition or reaction? (III.G.3., 264.17(a))

Yes _____ No _____

b. When ignitable or reactive wastes are being handled, are smoking and open flames confined to designated areas? (III.G.2, 264.17(a))

Yes _____ No _____

c. Are "No Smoking" signs conspicuously placed wherever there is a hazard from ignitable or reactive wastes? (III.G.2, 264.17(a))

Yes _____ No _____

2. If the facility is storing ignitable or reactive waste, or mixing incompatible waste or incompatible wastes and other materials, are precautions being taken to prevent reactions which:

a. Generate extreme heat or pressure, fire or explosions, or violent reactions? (III.G.1, 264.17(b)(1))

Yes _____ No _____

b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? (III.G.1, 264.17(b)(2))

Yes _____ No _____

c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions? (III.G.1, 264.17(b)(3))

Yes _____ No _____

d. Damage the structural integrity of the device or facility? (III.G.1, 264.17(b)(4))

Yes _____ No _____

e. Through other like means threaten human health or the environment? (III.G.1, 264.17(b)(5))

Yes _____ No _____

3. Has GMC Dayton provided documentation that compliance with the above requirements (a and b) has been achieved and maintained? (III.G.4, 264.17(c))

Yes _____ No _____

Section II.G. Comments: _____

_____

II.H. PREPAREDNESS AND PREVENTION

II.H.1. REQUIRED EQUIPMENT

GMC Dayton is required to have on site all equipment listed below. Note below if this equipment is present.

a. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel? (II.H.1, 264.32(a))

Yes _____ No _____

b. A device, such as a telephone (immediately available at the scene of operations), capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? (II.H.1, 264.32(b))

Yes _____ No _____

c. Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment? (II.H.1, 264.32(c))

Yes _____ No _____

d. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems? (II.H.1, 264.32(d))

Yes _____ No _____

Section II.H.1. comments: _____

_____

II.H.2. TESTING AND MAINTENANCE OF EQUIPMENT

Does the facility test and maintain as necessary the equipment specified in checklist section B.8. to assure its proper operation in time of emergency? (II.H.2, 264.33)

Yes _____ No _____

II.H.3. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM

a. Do all personnel, who are pouring, mixing, spreading or otherwise handling hazardous waste, have immediate access to

an internal alarm or emergency communication device, either directly through visual or voice contact with another employee? (II.H.3, 264.34(a))

Yes _____ No _____

b. If there is ever just one employee on the premises while the facility is operating, does he or she have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance? (II.H.3, 264.34(b))

Yes _____ No _____

c. If a response of "No" was given for either of the above questions, does GMC Dayton have a ruling from the Regional Administrator that such access to communication systems is not required under 40 CFR 264.32? (II.H.3, 264.34)

Yes _____ No _____

Section II.H.3. Comments: _____

_____

II.H.4. <u>REQUIRED AISLE SPACE</u>

Does the facility maintain aisle space to allow for unobstructed movement of personnel and fire protection, spill control, and decontamination equipment to any area of facility operation in an emergency? (II.H.4, 264.35)

Yes _____ No _____

Comments: _____

_____

II.H.5. <u>ARRANGEMENTS WITH LOCAL AUTHORITIES</u>

a. Did GMC Dayton within six (6) months prior to operation: (II.H.5)

i. Make arrangements to familiarize police, fire departments, and emergency response teams with the facility layout, hazardous waste properties (and associated hazards), typical work locations, entrances to and roads inside the facility, and potential evacuation routes? (II.H.5, 264.37(a)(1))

Yes _____ No _____

ii. Where more than one police and fire department might respond to an emergency, make agreements

designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority? (II.H.5, 264.37(a)(2))

Yes _____ No _____

iii. Make agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (II.H.5, 264.37(a)(3))

Yes _____ No _____

iv. Make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility? (II.H.5, 264.37(a)(4))

Yes _____ No _____

Section II.H.5 comments: _____

_____

b. If State and local agencies have declined to enter such arrangements, has GMC Dayton documented the refusal in the operating record? (II.H.5, 264.37(b))

Yes _____ No _____

Section II.H.5. Comments: _____

_____

II.I. CONTINGENCY PLAN

II.I.1. IMPLEMENTATION OF CONTINGENCY PLAN

a. Has a hazardous waste emergency situation (such as a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment) occurred at the facility which required implementing the contingency plan? (II.I.1, 264.51(b))

Yes _____ No _____

If no, proceed to checklist section B.14.

If yes, please describe the incident: _____

_____

_____

If yes, did the following occur:

b. Did the discoverer of the emergency situation contact one of the emergency coordinators listed in Attachment III? (II.I.1, Section G-2 of Attachment V)

Yes _____ No _____ CD _____

c. Did the Emergency Coordinator immediately activate internal facility alarms or communication systems no notify all facility personnel? (II.I.1, 264.56(a)(1), Section G-4a of Attachment V)

Yes _____ No _____ CD _____

d. Did the Emergency Coordinator immediately notify appropriate State or local agencies with designated response roles if their help was needed? (II.I.1, 264.56(a)(2), Section G-4a of Attachment V)

Yes _____ No _____ CD _____

e. Did the Emergency Coordinator immediately determine the type, exact source, amount, and areal extent of waste involved using the storage records, manifests and/or chemical analysis? (II.I.1, 264.56(b), Section G-4b of Attachment V)

Yes _____ No _____ CD _____

f. Did the Emergency Coordinator use the information given to him by the incident reporter and the data from the storage records to determine the direct and indirect hazards to human health and the environment? (II.I.1, 264.56(c), Section G-4c of Attachment V)

Yes _____ No _____ CD _____

Section II.I.1a-f Comments: _____

_____

_____

g. If the Emergency Coordinator determined that an immediate threat to human health or the environment was posed as a result of a release, fire, or explosion, did he/she do the following:

i. Notify appropriate local authorities of any need to evacuate local areas? (II.I.1, 264.56(d)(1))

Yes _____ No _____ CD _____

ii. Notify the on-scene coordinator (government official) responsible for the geographical area, or the National Response Center? (II.I.1, 264.56(d)(2))

Yes _____ No _____ CD _____

iii. Was the following information included when the above notification was made?
(II.I.1, 264.56(d)(2)(i-vi))

- Name and phone number of reporter	Yes__No__
- Name and address of facility	Yes__No__
- Time and type of incident	Yes__No__
- Names and quantities of materials involved	Yes__No__
- The extent of injuries, if any	Yes__No__N/A__
- Possible hazards to human health and the environment outside the facility	Yes__No__

If no, explain: _____
_____

h. Were all reasonable measures taken to ensure that further fires, explosions, and releases did not occur, recur, or spread to other hazardous waste at the facility? (II.I.1 264.56(e), Section G-4d and G-4e of Attachment V)

Yes _____ No _____ C/D _____

i. If facility operations were stopped, did the Emergency Coordinator monitor for leaks, spills, pressure build up, gas generation, and ruptures in the drums, drum storage areas, tanks and other equipment as applicable? (II.I.1, 264.56(f))

Yes _____ No _____

Section II.I.1.g-i Comments: _____
_____

j. Immediately after the emergency, did the Emergency Coordinator provide for the treatment, storage or disposal of recovered waste, contaminated soil, surface water, and/or absorbent material? (II.I.1, 264.56(g), Section G-4f of Attachment V)

Yes _____ No _____ C/D _____

k. Did the Emergency Coordinator ensure that no incompatible waste was stored, treated, or disposed of in the area of the released waste until clean-up operations were complete, and that all emergency equipment was cleaned and/or replaced and fit for its intended use? (II.I.1, 264.56(h)(1)(2), Section G-4g of Attachment V)

Yes _____ No _____ C/D _____

l. If the Contingency Plan has been implemented, was the Regional Administrator and appropriate State and local authorities notified that the facility is in compliance with 264.56(h) (checklist item i above)? (II.I.1, 264.56(i), Section G-4g of Attachment V)

Yes _____ No _____ N/A _____

m. If the spill involved a leaking container were the following steps taken:

i. The leak was stopped, if possible, until the material could be transferred into a sound container? (II.I.1, 264.171, Section G-4h of Attachment V)

Yes _____ No _____ N/A _____

ii. Was any spilled material cleaned up by using absorbent material and disposing, or by flushing with sufficient water into the containment system? (II.I.1, 264.171, Section G-4h of Attachment V)

Yes _____ No _____ N/A _____

n. If a leak developed in a waste tank or process piping, were the following steps taken:

i. Operations were immediately shut down? (II.I.1, 264.194(c), Section G-4i of Attachment V)

Yes _____ No _____ N/A _____

ii. The tank was drained into a suitable tank wagon since the leak could not be stopped by closing valves, etc.? (II.I.1, 264.194(c), Section G-4i of Attachment V)

Yes _____ No _____ N/A _____

iii. If the waste was leaking too rapidly to secure a tank wagon, was a clean waste drum from the waste management area was used? (II.I.1, Section G-4i of Attachment V)

Yes _____ No _____ N/A _____

iv. Was disposal of the material spilled within the containment system done by flushing with sufficient amounts of water? (II.I.1, Section G-4h of Attachment V)

Yes _____ No _____ N/A _____

o. Were the following details of the emergency noted in the facility's operating record? (II.I.1, 264.56(j))

- Name and phone number of owner/operator — Yes No__
- Name and address of facility — Yes__ No__
- Time and type of incident — Yes__ No__
- Names and quantities of materials involved. — Yes__ No__

Comment: _____

_____

p. Was a written report sent to the Regional Administrator within 15 days of the incident? (II.K.1, 264.56(j), Section G-8 of Attachment V)

Yes _____ No _____

If no, go to checklist II.I.2.

If yes, did the report contain the following:

i. Name, address and telephone number of the owner and operator? (II.K.1, 264.56(j)(1))

Yes _____ No _____

ii. Name, address, and telephone number of the facility? (II.K.1, 264.56(j)(2))

Yes _____ No _____

iii. Date, time, and type of incident? (II.K.1, 264s.56(j)(3))

Yes _____ No _____

iv. Name and quantities of material(s) involved? (II.K.1, 264.56(j)(4))

Yes _____ No _____

v. The extent of any injuries, if any? (II.K.1, 264.56(j)(5))

Yes _____ No _____

vi. Assessment of actual/potential hazards to human health or the environment, where applicable? (II.K.1,

264.56(j)(6))

Yes _____ No _____

vii. Estimated quantity and disposition of recovered materials? (II.K.1, 264.56(j)(7))

Yes _____ No _____

Section II.I. Comments: _____

_____

_____

_____

II.I.2. COPIES OF PLAN

a. Is a copy of the contingency plan and all revisions maintained at the facility? (II.I.2, 264.53(a), Section G-6 of Attachment V)

Yes _____ No _____

b. Were copies of the contingency plan submitted to the following? (II.I.2, 264.53(b))

- Dayton Police Department Yes ___ No ___
- St. Elizabeth Hospital Yes ___ No ___
- Dayton Fire Department Yes ___ No ___
- Emergency Response - Ohio EPA Yes ___ No ___

Section II.I.2. Comments: _____

_____

_____

II.I.3. AMENDMENT TO PLAN

Was the Contingency Plan reviewed and immediately amended if any of the following occurred:

a. Permit revised? (II.I.3, 264.54(a))

Yes _____ No _____ N/A _____

b. The contingency plan failed in an emergency? (II.I.3, 264.54(b))

Yes _____ No _____ N/A _____

c. The facility changed such that the potential for fires, explosions, or releases required changes in emergency response procedures? (II.1.3, 264.54(c))

Yes _____ No _____ N/A _____

d. The list of Emergency Coordinators changed? (II.I.3, 264.54(d))

Yes _____ No _____ N/A _____

NOTE: Names of Emergency Coordinators are listed in Attachment III of this checklist. Please note below if these names have changed:

Deletions: _____

_____

Additions: _____

_____

e. The list of emergency equipment changed? (II.I.3, 264.54(e))

Yes _____ No _____ N/A _____

Section II.I.3. Comments: _____

_____

II.I.4. EMERGENCY COORDINATOR

a. Is one of the emergency coordinators either on the premises or on call at all times? (II.I.4, 264.55))

Yes _____ No _____

b. Are the emergency coordinators familiar with the following: (II.I.4, 264.55)

- The contingency plan Yes ___ No ___
- Facility operations/activities Yes ___ No ___
- Waste characteristics and locations Yes ___ No ___
- Location of all records within the facility Yes ___ No ___
- Facility layout Yes ___ No ___

c. Do the emergency coordinators have the authority to commit resources needed to carry out the contingency plan? (II.I.4, 264.55, Section G-2 of Attachment V)

Yes _____ No _____

Section II.I.4. Comments: _____

_____

II.J. MANIFEST SYSTEM

1. When receiving hazardous waste accompanied by a manifest or shipping paper, does GMC Dayton use the following procedures:

a. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest or shipping paper was received? (II.J, 264.71(a)(1))

Yes _____ No _____ CD _____

If no, explain: _____
_____

b. Note any significant discrepancies in the manifest or shipping paper? (II.J, 264.71(a)(2))

Yes _____ No _____ N/A _____

If no, explain: _____
_____

c. Immediately give the transporter at least one copy of the signed manifest? (II.J, 264.71(a)(3))

Yes _____ No _____ C/D _____

d. Within 30 days after the delivery, send a copy of the manifest to the generator? (II.J, 264.71(a)(4))

Yes _____ No _____ C/D _____

e. Retain at the facility a copy of each manifest for at least three years from the date of delivery? (II.J, 264.71(a)(5))

Yes _____ No _____ C/D _____

2. Did GMC Dayton attempt to reconcile any significant discrepancy with the waste generator or transporter? (II.J, 264.72(b))

Yes _____ No _____ N/A _____

If no, explain: _____
_____

a. Was the discrepancy resolved within 15 days after receiving the waste? (II.J, 264.72(b))

Yes _____ No _____ N/A _____

b. If no, did GMC Dayton submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue? (II.J, 264.72(b))

Yes _____ No _____ N/A _____

If no, explain: _____

_____

3. If GMC Dayton accepted any hazardous waste without an accompanying manifest or shipping paper and if the waste was not excluded from the manifest requirement, did GMC Dayton submit a single copy of a report to the Regional Administrator within fifteen days after receiving the waste? (II.J, 264.76)

Yes _____ No _____ N/A _____

If yes, continue to checklist section B.19.

If no, explain: _____

_____

4. Was this Unmanifested Waste Report submitted on EPA form 8700-13B and designated 'Unmanifested Waste Report'? (II.J, 264.76)

Yes _____ No _____

If no, explain: _____

_____

5. Did the Unmanifested Waste Report include the following information? (II.J, 264.76)

a. EPA identification number, name, and address of the facility? (II.J, 264.76(a))

Yes _____ No _____

b. The date the facility received the waste? (II.J, 264.76(b))

Yes _____ No _____

c. The EPA identification number, name, and address of the generator and the transporter, if available? (II.J, 264.76(c))

Yes _____ No _____

d. A description and the quantity of each hazardous waste and facility received? (II.J, 264.76(d))

Yes _____ No _____

e. The method of treatment, storage, or disposal for each hazardous waste? (II.J, 264.76(e))

Yes _____ No _____

f. The certification signed by the owner or operator of the facility or his authorized representative? (II.J, 264.76(f))

Yes _____ No _____

g. A brief explanation of why the waste was unmanifested? (II.J, 264.76(g))

Yes _____ No _____

Section B.18 Comments: _____

_____

_____

II.K. RECORDKEEPING AND REPORTING

II.K.1. OPERATING RECORD

Is the following information recorded as it becomes available and maintained in an operating record (all records are to be retained until closure unless otherwise noted) at the facility:

a. A description and the quantity of each hazardous waste, and the method(s) and date(s) of its treatment, storage or disposal at the facility? (II.K.1, 264.73(b)(1))

Yes _____ No _____

Comments: _____

_____

b. The location of each hazardous waste and the quantity at each location (cross-referenced by manifest)? (II.K.1, 264.73(b)(2))

Yes _____ No _____

Comments: _____

_____

c. Records and results of waste analysis performed? (II.K.1, 264.73(b)(3))

Yes _____ No _____

Comments: _____

_____

d. Summary reports and details of all incidents that required contingency plan implementation? (II.K.1, 264.73(b)(4))

Yes _____ No _____

Comments: _____

_____

e. Records and results of inspections as required by 40 CFR 264.15(d) (retain for three years only)? (II.K.1, 264.73(b)(5))

Yes _____ No _____

Comments: _____

_____

f. Information on monitoring, testing, analytical data and corrective action? (II.K.1, 264.74(b)(6))

Yes _____ No _____

Comments: _____

_____

g. Inform the generator in writing that GMC Dayton has the appropriate permit(s) for the waste the generator is shipping? (II.K.1, 264.73(b)(7), 264.12(b))

Yes _____ No _____

Comments: _____

_____

h. Most current closure cost estimates? (II.K.1, 264.73(b)(8))

Yes _____ No _____

Comments: _____

_____

II.K.2. **BIENNIAL REPORT**

a. Has GMC Dayton submitted a Biennial Report to the Regional Administrator by March 1 of each even numbered year? (II.K.2, 264.75)

Yes _____ No _____

b. Do the biennial reports contain the following information:

i. EPA identification number, name, and address of the facility? (II.K.2, 264.75(a))

Yes _____ No _____

ii. The calendar year covered by the report? (II.K.2, 264.75(b))

Yes _____ No _____

iii. EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? (II.K.2, 264.75(c))

Yes _____ No _____

iv. A description and the quantity of each hazardous waste the facility received during the year listed by EPA identification number of each generator? (II.K.2, 264.75(d))

Yes _____ No _____

v. The method of treatment or storage for each hazardous waste? (II.K.2, 264.75(e))

Yes _____ No _____

vi. The most recent closure cost estimate? (II.K.2, 264.75(g))

Yes _____ No _____

vii. For generators who treat, store, or dispose of hazardous waste on-site, a description of the efforts undertaken during the year to reduce the volume and toxicity of the wastes(s) generated? (II.K.2, 264.75(h))

Yes _____ No _____

viii. For generators who treat, store, or dispose of

hazardous waste on-site, a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for the years prior to 1984? (II.K.2, 264.75(i))

Yes _____ No _____

ix. Certification signed by the facility owner/operator, or his/her representative? (II.K.2, 264.75(j))

Yes _____ No _____

x. Has GMC Dayton submitted all of the following additional reports to the Regional Administrator in the event of:

- Release, fires, and/or explosions	Yes ___	No ___	N/A ___
- Facility closures	Yes ___	No ___	N/A ___
- Otherwise required by Subparts F through J, and O	Yes ___	No ___	N/A ___

Section II.K.2. comments: _____

_____

II.L. CLOSURE

II.L.1. CLOSURE PERFORMANCE STANDARD

a. Is GMC Dayton in the process of partial or final closure, or have they completed partial or final closure?

Yes _____ No _____

If no, go to checklist section B.29.

b. Has the GMC Dayton facility been closed or in the process of being closed in a manner that: (II.L.1, 264.111)

i. Minimizes the need for further maintenance; and

ii. Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground waters or to the atmosphere?

Yes _____ No _____ N/A _____

Section II.L.a and b. comments: _____

_____

During closure of the tank and drum storage areas at the facility, did the following procedures occur:

c. Did the facility terminate all hazardous waste activity? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

d. Were the contents of all tanks placed in either drums or bulk tankers for disposal? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

e. Were all scrap solvents removed for disposal? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

f. Were all underground tanks filled with aqueous detergent solution (5% alkali cleaner) for removal of residue materials? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

g. Were all cleaned aboveground and underground tanks rinsed with water to remove any balance of wash solution, then transported via portable tanks to the batch wastewater treatment facility for treatment? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

h. Were the samples of the above rinse water analyzed by Chem Lab? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

i. Did rinsing of all tanks continue until the lab tests indicate the wastes are no longer hazardous under RCRA? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

j. Was the trenching around the drum storage pad examined and any residues removed? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

k. Were the empty and completely decontaminated above and underground tanks either removed OR filled with dry sand and welded closed? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

l. Was the soil immediately around the fill and drain lines removed and transported to a secure chemical landfill? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

m. Was the concrete drum storage pad steam cleaned and the residue placed in drums and transported off-site for disposal? (II.L.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

n. Did the facility submit certification of closure by an independent registered professional engineer? (II.1.1, Section III of Attachment VI)

Yes _____ No _____ N/A _____

Section II.L.1. comments: _____

_____

_____

II.L.2. AMENDMENT TO CLOSURE PLAN

a. Have any of the following occurred at the facility: changes in operating plans, facility design, or expected year of closure; unexpected events in the course of closure activities? (II.L.2, 264.112(c)(2))

Yes _____ No _____

If no, go to checklist section II.M.

b. Did any of the events in question II.L.1. affect the closure plan? (II.L.2, 264.112(c))

Yes _____ No _____

If no, go to checklist section II.L.3.

If yes, specify: _____

_____

c. Was a written request for a permit modification (including a copy of the amended plan) submitted to the Regional Administrator at least 60 days prior to the proposed change in facility design or operations, or no

later than 60 days after an unexpected event which affected the closure plan? (II.L.2, 264.112(c)(3))

Yes _____ No _____

d. Was a permit modification requested from the Regional Administrator no later than 30 days after an unexpected event which affected the closure plan? (II.L.2, 264.112(c)(3))

Yes _____ No _____

e. Were any changes made to the closure plan at the request of the Regional Administrator? In addition, were these changes made within the required 60 days or 30 days if during closure? (II.L.2, 264.112(c)(4))

Yes _____ No _____ N/A _____

Section II.L.2. Comments: _____

_____

II.L.3. **NOTIFICATION OF CLOSURE**

If either partial or final closure have occurred, or are now occurring, was the Regional Administrator notified 180 days prior to initiating the closure activities? (II.L.3)

Yes _____ No _____

Section B.24. Comments: _____

_____

II.L.4. **TIME ALLOWED FOR CLOSURE**

a. Has GMC Dayton received the final volume of hazardous waste? (II.L.4, 264.113 (a))

Yes _____ No _____

If no, go to checklist section II.L.5.

If yes, was the following closure schedule adhered to for removal of all hazardous waste and closure activities:

i. Was the hazardous waste inventory treated and/or disposed of within 90 days after the initiation of closure? (II.L.4, 265.113(a))

ii. Was the completion of closure and certification of closure submitted to the Regional Administrator and the Ohio EPA within 180 days after initiation of closure activities? (II.L.4, 265.113(b))

Yes _____ No _____

Note any variations from schedule: _____

_____

II.L.5. DISPOSAL OR DECONTAMINATION OF EQUIPMENT

Due to the limited nature of the facility and the brevity of the closure plan (Attachment VI of the permit), details of Permit Condition II.L.5 are an integral part of checklist section II.L.1 (Permit Condition II.L.1). The following question requires the inspector to assess closure activities against 40 CFR 264.114.

If closure activities are not underway or have not occurred, go to checklist section II.M.

Was all contaminated equipment including, but not limited to, drums and the drum storage areas, storage tanks, production equipment, and clean up equipment either decontaminated or properly disposed of? (II.L.5, 264.114)

Yes _____ No _____ CD _____ N/A _____

Note any deficiencies or areas of concern: _____

_____

_____

_____

_____

II.L.6. CERTIFICATION OF CLOSURE

If closure activities have not been completed, go to checklist section II.M.

a. Was a certification of closure submitted by registered mail to the Regional Administrator within 60 days of completion? (II.L.6, 264.115)

Yes _____ No _____

b. If yes, was the certification of closure signed by the owner/operator and an independent registered professional engineer? (II.L.6, 264.115, Section III of Attachment VI)

Yes _____ No _____

c. If the Regional Administrator requested supporting documentation (prior to release from financial assurance), was it provided? (II.L.6, 264.115)

Yes _____ No _____

Section B.28. Comments: _____

_____

II.M. COST ESTIMATE FOR FACILITY CLOSURE

Note: The total closure cost estimate for GMC Dayton is $47,248.

1. Has GMC Dayton adjusted the closure cost estimate for inflation annually within 30 days after each anniversary of the date on which the first closure cost estimate was prepared? (II.M.1, 264.142(b), Section IV of Attachment VI)

Yes _____ No _____

2. If GMC Dayton has changed their closure plan (and the changes made increase the cost of closure), did they revise the closure cost estimate within 30 days of approval of the modified plan? (II.M.2, 264.142(c))

Yes _____ No _____

3. Is the latest closure cost estimate kept at the facility? (II.M.3, 264.142(d))

Yes _____ No _____

Section B.29. Comments: _____

_____

II.N. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

1. Has the Regional Administrator notified GMC Dayton that they are no longer subject to financial assurance requirements due to final closure completion/certification? (II.N, 264.143(i))

Yes _____ No _____

If yes, go to checklist section II.O.

Comments: _____

_____

2. Has GMC Dayton established financial assurance at least in the amount of their most recent closure cost estimate, using one of the options presented in 40 CFR 264.143(a-f)? (II.N, 264.143)

Yes ____ No ____

If yes, note option used: _____

_____

3. If financial assurance mechanisms have been changed, were they approved by the Regional Administrator per 40 CFR 264.143? (II.N)

Yes _____ No _____ N/A _____

Note any changes: _____
_____

4. Has the facility documented compliance with financial assurance requirements in adherence with 40 CFR 264.151? (II.N)

Yes _____ No _____

If yes, note documentation: _____
_____

II.O. LIABILITY REQUIREMENTS

1. Has the Regional Administrator notified GMC Dayton that they are no longer subject to liability insurance requirements due to final closure completion/certification? (II.O, 264.147(e))

Yes _____ No _____

If yes, go to checklist section II.P.

Comments: _____
_____

2. Has GMC Dayton obtained and maintained liability coverage for sudden and accidental occurrences in the amount of one million dollars per occurrence, with an annual aggregate of at least two million dollars (exclusive of legal defense costs)? (II.O, 264.147(a))

Yes _____ No _____

If no, go to checklist section II.P.

If yes, note insurance carrier: _____
_____

3. Has a signed duplicate original of either a Hazardous Waste Facility Liability Endorsement or Certificate of Liability Insurance been sent to the Regional Administrator? (II.O, 264.147(a)(1)(i))

Yes _____ No _____

Comments: _____

4. If a claim for bodily injury or property damage has been filed, was the Regional Administrator notified in writing within 30 days? (II.O, 264.147(a)(7))

Yes _____ No _____ N/A _____

If a claim has been filed, describe: _____

5. If GMC Dayton has reduced their amount of liability coverage, was the Regional Administrator notified in writing within 30 days? (II.O, 264.147(a)(7))

Yes _____ No _____ N/A _____

Comments: _____

6. Has the facility documented compliance with financial assurance requirements in adherence with 40 CFR 264.151? (II.O)

Yes _____ No _____

If yes, note documentation: _____

7. Did GMC Dayton use a State-required mechanism (pursuant to 264.149) to meet financial assurance for closure (264.143) and liability insurance (264.147) requirements? (II.O)

Yes _____ No _____

If no, go to checklist section B.32.

8. Was documentation provided to the OEPA Director of Solid and Hazardous Waste Management Division, with copies submitted to the U.S. EPA Regional Administrator? (II.O)

Yes _____ No _____

Comments: _____

II.P. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

1. If GMC Dayton has commenced proceedings under Title 11 (Bankruptcy) U.S. Code, was the Regional Administrator

notified within 10 days after proceedings commenced? (II.P, 264.148(a))

Yes _____ No _____ N/A _____

Note status of proceedings (if applicable): _____
_____

2. If the institution providing financial assurance or insurance to GMC Dayton has filed bankruptcy, or has been suspended/revoked of authority to provide such assurance/insurance, did GMC Dayton establish alternative financial assurance or liability coverage within 60 days? (II.P, 264.148(b))

Yes _____ No _____ N/A _____

Comments: _____
_____

ADDITIONAL SECTION II. COMMENTS: _____
_____
_____
_____
_____
_____
_____
_____
_____

III. STORAGE IN CONTAINERS

III.A. WASTE IDENTIFICATION

Does the GMC Dayton inventory exceed 12,550 gallons? (III.A.)

Yes _____ No _____ CD _____

If CD, indicate reasons, if Yes or No provide information on the number of drums and approximate waste quantity: _____

_____

_____

Does the facility store in drums wastes other than those specified below: (III.A)

U.S. EPA Hazardous Waste Number	Hazardous Waste
D001	Ignitable wastes such as polyol
D008	Wastes containing lead such as paint sludge
F002	Spent halogenated solvents
U223	Toluene diisocyanate (TDI)

Yes _____ No _____

If yes, please specify additional wastes: _____

_____

_____

III.B. CONDITION OF CONTAINERS

If containers holding hazardous wastes lose their integrity (e.g., severe rusting, structural defects, begins leaking), are the wastes transferred to a container that is in good condition? (III.B)

Yes _____ No _____ N/A _____

Note if any leaking/damaged containers were observed: _____

_____

_____

III.C. COMPATIBILITY OF WASTE WITH CONTAINERS

Does GMC Dayton use containers which will not react with, and are otherwise compatible with, the wastes stored in them? (III.C, 264.172)

Yes _____ No _____

If no, note types of containers used for each waste code:

_____

_____

III.D. **MANAGEMENT OF CONTAINERS**

1. Are containers always stored closed, except when adding or removing wastes? (III.D, 264.173(a))

Yes _____ No _____

If no, explain: _____

_____

2. Are containers opened, handled, or stored in a manner which may cause them to leak? (III.D, 264.173(b))

Yes _____ No _____

Note any unsafe handling practices: _____

_____

III.E. **CONTAINMENT**

1. Is the concrete free of cracks and gaps, and impervious so as to contain leaks, spills, and precipitation until these materials are detected and removed? (III.E, 264.175(b)(1))

Yes _____ No _____

Note any deficiencies or concerns: _____

_____

2. Is the concrete base sloped or otherwise designed and operated to drain and remove liquids resulting from leaks, spills or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids? (II.E, 264.175(b)(2))

Yes _____ No _____

Comment: _____

_____

3. Does the containment capacity have sufficient capacity to contain 10% of the volume of containers (holding free

liquids only) or the volume of the largest container, whichever is greater? (II.E, 264.175(b)(3))

Yes _____ No _____

4. Is run-on into the containment system prevented by some means or does the containment system have sufficient excess capacity in addition to the 10% specified above to hold any run-on which might enter the system? (II.E, 264.175(b)(4))

Yes _____ No _____

Comment: _____

_____

5. Does GMC Dayton remove spilled or leaked waste and accumulated precipitation from the sump or collection area in a timely manner so as to prevent overflow of the collection system? In addition, are these collected wastes managed as a hazardous waste in accordance with the conditions of this permit if the material is a hazardous waste as defined by 40 CFR Part 261? (II.E, 264.175(b)(5))

Yes _____ No _____ N/A _____

Note any areas of concern with these systems: _____

_____

_____

III.F. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

Are containers holding ignitable or reactive wastes located at least 50 feet from the facility's property line? (III.F, 264.176)

Yes _____ No _____

Comments: _____

_____

III.G. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. Does GMC Dayton prevent the storage of incompatible wastes in the same container? (III.G.1, 264.177(a)))

Yes _____ No _____ N/A _____

2. Does GMC Dayton assure that no incompatible waste are placed in an unwashed container that previously held an incompatible waste or material? (III.G.2, 264.177(b)))

Yes _____ No _____ N/A _____

3. If incompatible wastes are stored at the facility, does GMC Dayton prevent the storage of wastes or materials nearby incompatible waste stored in containers or tanks? (III.G.3, 264.177(c))

Yes _____ No _____ N/A _____

Section III.G. comments: _____

_____

Indicate approximate aisle spacing and storage layout:

_____

_____

ADDITIONAL SECTION III. COMMENTS: _____

_____

_____

_____

_____

_____

_____

IV. STORAGE IN TANKS

IV.A. WASTE IDENTIFICATION

a. Do the hazardous waste tank storage areas consist of no more than the following:

i. Two existing above-ground tanks used for aqueous waste storage with an approximate total capacity of 15,000 gallons? (IV.A)

Yes _____ No _____

Describe any discrepancies: _____

b. Is the facility storing in tanks wastes other than those specified below: (IV.A)

U.S. EPA Hazardous Waste Number	Hazardous Waste
F002	Spent halogenated solvents
F003	Spent non-halogenated solvents such as xylene
F005	Spent non-halogenated solvents such as brake resins
D006	Wastes containing cadmium such as various paints
D007	Wastes containing chromium such as various paints
D008	Wastes containing lead such as various cements

Yes _____ No _____

If yes, please specify additional wastes: _____

IV.B. DESIGN OF TANKS

Does GMC Dayton maintain the minimum shell thickness, as specified below, at all times to ensure sufficient shell

strength? In addition, are tanks that wear to less than the minimum design shell thickness repaired or removed from service? (IV.B)

Tank No.	Shell Thickness
1	.04 inches
2	.20 inches

Yes _____ No _____ CD _____ N/A _____

Section E.3. comments: _____

_____

IV.C. GENERAL OPERATING REQUIREMENTS

1. Are all GMC Dayton tanks designed and constructed to protect the tanks from accelerated corrosion, erosion or abrasion in accordance with 264.192? (IV.C.1)

Yes _____ No _____ N/A _____

2. Are all GMC Dayton tanks equipped to prevent overfill as required by 264.192(b)? (IV.C.2)

Yes _____ No _____ N/A _____

Indicate systems present: _____

IV.D. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

Does GMC Dayton place ignitible or reactive wastes only in tanks where:

1. The waste is treated, rendered, or mixed before or immediately after placement in the tank so that: (IV.D.1)

a. The resulting waste, mixture, or dissolved material no longer meets the definition of ignitable or reactive waste under 261.21 or 261.23? (IV.D.1, 264.198(a)(1)(i))

Yes _____ No _____ CD _____ N/A _____

b. Section 264.17(b) is complied with? (IV.D.1, 264.198(a)(1)(ii)) **OR**

Yes _____ No _____ CD _____ N/A _____

c. Is the waste stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? (IV.D.1, 264.198(a)(2)) **OR**

Yes _____ No _____ CD _____ N/A _____

d. Is the tank system is used solely for emergencies? (IV.D.1, 264.198(a)(3))

Yes _____ No _____ CD _____ N/A _____

2. Has GMC Dayton documented compliance with IV.D.1. as required by 264.17(c) and placed this documentation within the operating record? (IV.D.2)

Yes _____ No _____

Section E.8. comments: _____

_____

IV.E. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. Does GMC Dayton place incompatible wastes, or incompatible wastes and materials, in the same tank system? (IV.E.1, 264.199(a))

Yes _____ No _____

a. If yes, is the facility complying with 264.17(b)? (IV.E.1, 264.199(a))

Yes _____ No _____

If no, please explain: _____

_____

b. Does GMC Dayton place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material? (IV.E.1, 264.199(b))

Yes _____ No _____

c. If yes, is the facility complying with 264.17(b)? (IV.E.1, 264.199(b))

Yes _____ No _____

If no, please explain: _____

_____

_____

2. Has GMC Dayton documented compliance with IV.E.1. as requir3ed by 40CFR 264.17(c) and Placed this documentation in the Operating Record?

Yes _____ No _____

SECTION IV. COMMENTS: _____

ADDENDUM A

LAND DISPOSAL RESTRICTIONS
GMC DAYTON PLANT (INLAND DIVISION)
(OHD 000 817 023)

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION
GMC DELCO DAYTON DIV. (OHD 000 817 023)
40 CFR PART 268

I. WASTE IDENTIFICATION

A. **List waste codes which the facility handles in each of the following LDR categories:**

1. F001 through F005 spent solvents:

_____

2. F020-F023 and F026-F028 dioxin-containing wastes:

_____

3. California List Wastes (See Appendix A):

_____

4. First Third Wastes [40 CFR 268.10]:

_____

5. Second Third Wastes [40 CFR 268.11]:

_____

6. Third Third Wastes [40 CFR 268.12]:

_____

B: **Waste Code Determination**

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268 [40 CFR 262.11(c)]

Yes _____ No _____

If no, list below:

Assigned Classification	Correct Classification

Comments _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic which is not addressed in the listing? [40 CFR 268.9(a)]

Yes _____ No _____ NA _____

Comments _____

3. Has multi-source leachate been assigned the F039 waste code? [40 CFR 261.31]

Yes _____ No _____ NA _____

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes _____ No _____

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes _____ No _____ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes _____ No _____ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes _____ No _____ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90) [40 CFR 268.35(b)]

Yes _____ No _____ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113,

K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes _____ No _____ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes _____ No _____ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U1236, U151. (expires - 05/08/92). [40 CFR 268.35(c)]

Yes _____ No _____ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92) [40 CFR 268.35(c)]

Yes _____ No _____ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refectory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes _____ No _____ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92) [40 CFR 268.35(c)]

Yes _____ No _____ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes _____ No _____ List _____

*Note 40 CFR 268.10 and 268.11 wastes incorrectly from this variance in the Third Third rule.

II. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13]

1. Has the waste analysis plan been revised to address restricted wastes [40 CFR 268.13(b)(6)]

   Yes _____ No _____

2. What date was the waste analysis plan last revised?
   ___/___/___

3. Does analytical data contain all the information required to treat or store restricted wastes? [40 CFR 268.7(a)(1)]

   Yes _____ No _____

4. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP), or the extraction procedure if allowed [40 CFR 268.7(b)(1)]

   Yes _____ No _____ NA _____

5. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis? 40 CFR 268.7(b)(3)]

   Yes _____ No _____ NA _____

6. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

   Yes _____ No _____ NA _____

B. Operating Record [40 CFR 264.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 268.7(b)(3) and 265.73(b)(3)]

   Yes _____ No _____

2. Does the operating record contain copies of LDR notifications and certifications? [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11),(13), and (15)]

   Yes _____ No _____

3. Does the operating record include appropriate documentation f restricted wastes which are managed wholly on site? [40 CFR

264.73(b)(12), (14), and (16) and 265.73(b)(12),(14), and (16)]

Yes _____ No _____ NA _____

Does the documentation discussed in points 2.and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?

Yes _____ No _____ NA _____

C. Storage [40 CFR 268.50]

1. Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

   Yes _____ No _____

2. Have wastes been stored less than one year since the applicable LDR regulations went into effect? [40 CFR 264.50(b)]

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal 50 ppm?

   Yes _____ No _____ (If No, go to D.)

   Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

   Yes _____ No _____

   Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

   Yes _____ No _____

D. ADDITIONAL COMMENTS, CONCERNS, OR ISSUES

ATTACHMENT I

TEST METHODS
GMC DAYTON
EPA I.D. NO. OHD000817023

REV. 2/24/89

METHODS

	E.P.A.[3]	STD METHODS[2]	OTHER[4]
pH (S.U.)	5.2[1]	p460	
Flash Point			ASTM D-93
Viscosity			ASTM D-88
Vapor Pressure			ASTM D-323
Specific Gravity		p121	
Heating Value			ASTM D-2015
Layers		p95, 129	Observation
Total Solids	160.3	p89	ASTM D-96
Ash Content		p95	
Total Cyanide	8.55[1]	p361	
Free Cyanide	8.55[1]	p376	
Sulfate	376.1, 377.1	p493	ASTM D-129
Chloride		p303	ASTM D-808
Silver	272.1, .2	p148	
Arsenic	206.3	p285	
Barium	208.1, .2	p152	
Cadmium	213.1, .2	p148	
Chromium	218.1, .2	p148	
Copper	220.1, .2	p148	
Mercury	245.1	p156	
Nickel	149.1, .2	p148	
Lead	239.1, .2	p159	
Selenium	270.3	p159	
Zinc	289.1, .2	p148	
E.P. Toxicity	SW-846 Section 7.0[1]		
PCB's	SW-846 Section 8.0[1]		

NOTE 1: "Test Methods for the Evaluation of Solid Waste, Physical / Chemical Methods" U.S.E.P.A.

NOTE 2: Standard Methods for the Examination of Water and Wastewater, 14th Edition, 1975.

NOTE 3: "Methods for Chemical Analysis of Water and Wastes" U.S.E.P.A.

NOTE 4: American Society for Testing and Materials, (A.S.T.M.) Philadelphia, Pennsylvania.

NOTE: New and/or alternate test methods, with E.P.A. approval, may be substituted at any time.

ATTACHMENT II

INSPECTION SCHEDULE
GMC DAYTON
EPA I.D. NO. OHD000817023

Date: June
Revi: No.:

INSPECTION SCHEDULE

Area/Equipment	Specific Item	Types of Problems	Frequency
Monitoring Equipment	Liquid Level Indicators	Wire cable corroded or frayed Sticking float or pulley Note level	Daily
Safety and Emergency Equipment	Absorbant Material	Out of stock Note approximate quantity	Monthly/As Need
	Absorbant Pads Absorbant Boom (Vandalia Only)	Out of stock Note approximate quantity	Monthly/As Need
	Empty Drums	Out of stock, corrosion, damage Note approximate quantity	Weekly
	Emergency Shower	Water pressure, leaking	Weekly
	Fire Extinguishers	Needs charging	Monthly/As Need
	Fire Alarm	Power failure	Per Plant Secur schedule

TABLE F-1

Date: June 15 1983
Revision No.:

INSPECTION SCHEDULE (Continued)

Area/Equipment	Specific Item	Types of Problems	Frequency
Security Devices	Security Fence	Corrosion, damage to chainlink fabric, damage to barb wire	Weekly
Container Storage Area	Container Placement	Wrong location or area Aisle space, stacking	Weekly
	Container Condition	Corrosion, leakage Open lids, labels missing*	Weekly
	Pallets	Damage, weakness	Weekly
	Concrete Pad	Cracks, wet spots, debris, settling	Weekly
	Containment Trench	Liquid present, cracks	Daily
	Warning Signs	Damage, hanging improperly	Weekly
	General Housekeeping	Debris Spilled material	Weekly Daily
	Storage Area Roof	Leaks, missing panels, deterioration	Weekly

*Labels to be inspected for date and content identification upon arrival.

TABLE F-1 (Continued)

INSPECTION SCHEDULE (Continued)

Area/Equipment	Specific Item	Types of Problems	Frequency
Operating Equipment (Tank Area)	Concrete Curb	Cracks, deterioration	Weekly
	Base, Foundation	Cracks, wet spots, settling	Weekly
	Tank Shell & Walls	Corrosion, discoloration, cracks, buckles, bulges, rust spots, blisters	Weekly
	Tank Supports	Corrosion, cracking, deterioration, damage	Weekly
	Pipes, Valves, and Fittings	Loss of metal thickness, leaks, corrosion, bad seals	Weekly
	Containment Trench	Liquid present	Daily
	Rainwater Release Valve	Open, inoperable	Daily
	Barrel Dumpers	Hydraulic fluid leaking or low Frayed or deteriorated hoses	Weekly
	Recirculation Pump	Oil reservoir filled, oil leaking	Daily

TABLE F-1 (Continued)

INSPECTION SCHEDULE (Continued)

Area/Equipment	Specific Item	Types of Problems	Frequency
Tank Area (Internal)	Tank Shell	Corrosion, loss of metal thickness, cracking	Yearly
NOTE: Tank to be checked by outside contractor			
Underground Oil Tank	Structural Integrity	"Stick check" for leaks	Yearly
		Note liquid level (feet)	Daily

TABLE F-1 (Continued)

ATTACHMENT III

EMERGENCY COORDINATORS
GMC DAYTON
EPA I.D. NO. OHD000817023

SECTION G

CONTINGENCY PLAN

The information contained herein is submitted in accordance with the requirements for a Contingency Plan, as contained in 40 CFR Section 122.25 (a)(7) and Section 264 Subpart D.

Contingency Plan

G-1 General Information

This contingency plan is for Inland Division of General Motors Corporation, covering both the Dayton and Vandalia plants. It is divided into three sections as follows:

1. Inland's Contingency Plan and Emergency Procedures for Waste Storage and Handling Area.
2. SPCC Plan - Oil Storage.
3. Emergency Procedures as set forth by Plant Security.

The requirements of Section 264 Subpart D will be addressed as necessary by references to these sections included as Appendix 1,2, and 3.

G-2 Emergency Coordinator

In the event of an emergency situation at the facility, the discoverer is to notify the nearest Plant Security officer on duty or dial 7-8743 (Plant Security) to initiate chain of communication shown on page 10 of Appendix 1. The emergency coordinator shall be the highest ranking Plant Security officer on duty. The primary coordinators are Tom Liles, Security Coordinator, Dayton, and L.K. Stapleton, Security Coordinator, Vandalia. Other emergency coordinators and telephone numbers are listed on pages 17 & 18 of the Contingency Plan. If the emergency involves a release or potential release of hazardous materials to the environment, the emergency coordinator

DAMES & MOORE A PROFESSIONAL LIMITED PARTNERSHIP
644 LINN STREET, SUITE 501, CINCINNATI, OHIO 45203 (513) 651-3440

May 31, 1991

U.S. EPA
RCRA Activities-Part B Application
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Lisa Pierard

Gentlemen:

Re: GMC Delco Products
Dayton Operations
RCRA Part B Permit Application
OHD 000 817 023

On behalf of GMC Delco Products, Dames & Moore is submitting the enclosed response to Ohio Environmental Protection Agency (OEPA) comments regarding the above referenced facility. The comments were transmitted to Delco Products in a January 17, 1991 letter from OEPA. The response is formatted as requested in the letter (i.e., new material in capital letter, removed material overstruck). Also enclosed is a written item by item response to each comment. We recommend that this be inserted in the front of the permit application. The pages enclosed are either replacement pages for those currently in the permit application or brand new pages that need to be inserted.

If you have any questions or comments regarding these responses please direct them to Mr. Richard Webster at (513) 455-3080.

Very truly yours

DAMES & MOORE

Linda E. Edwards
Associate

LEE/mh(20a)
00299-198-122

cc: T. Crepeau, Ohio EPA-DS HWM
H. O'Connell, Ohio EPA-SWDO

042-27

8) G-4g Incompatible Waste:
OAC 3745-50-44(A)(7); 3745-54-56

GMC Delco must submit information on <u>what</u> measures will be taken to ensure that no incompatible wastes are treated, stored or disposed of upon a release of hazardous waste.

Section G.4.g has been revised to describe what measures will be taken to ensure that no incompatible released wastes are stored in the affected area.

9) G-4h Post Emergency Equipment Maintenance:
OAC 3745-54-56(G)

Describe the procedures to be employed for managing all rinseate generated as a result of decontamination activities conducted on the facilities post-emergency equipment.

All rinseate generated as a result of decontamination activities conducted in post-emergency equipment will immediately be collected into 55-gallon steel drums from stock empties (DOT approved). It will then be tested to see if it is hazardous. If the rinseate is determined to be hazardous, then it will be managed as hazardous waste onsite until it can be shipped offsite for disposal at a RCRA-permitted facility. If the rinseate is determined not to be hazardous, then it will be managed in an appropriate manner.

10) G-4i Container Spills and Leakage:
OAC 3745-54-22(A)

Revise plan to include a reference to those procedures to be implemented for assuring that immediate removal of liquids which have accumulated as a result of any spillage and/or leakage from containers situated within the secondary containment structure will occur.

Section G.4.i has been revised to show the procedures to be implemented for immediate removal of liquids which have collected in the secondary containment structure.

11) G-6 Coordination Agreement:
OAC 3745-54-52(C)

The plan must be revised to correctly list the current address of Ohio EPA's Southwest District Office, as listed in the coordinated agreements section (G.6; page G-11), to read:

Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402

Section G.6, page G-12, has been revised to correctly list the current address of the Ohio EPA's Southwest District Office.

12) G-7 Evacuation Plan:
OAC 3754-54-52(F)

GMC Delco will need to submit more <u>detailed</u> information on the emergency alarm system. Is the alarm system a single speaker set-up that can be clearly heard throughout the facility, or does each have its own emergency alarm speaker? Does the alarm have a direct connection with the local fire department, or will they be contacted by other means? What test will be performed to insure that the emergency alarm system is in good working order?

Section G.7 has been revised to more clearly describe the functioning of the emergency alarm system. Appendix G-5 has been added, which illustrates the Area Evacuation Alarm System Operation. The alarm system will be tested once a month to ensure proper functioning.

CLOSURE PLAN AND FINANCIAL REQUIREMENTS

13) I-1 Closure Plan:
OAC 3745-55-12

Revise the capacity of the container storage area related in Section I.1.5.2; page I-5 to maintain consistency with the capacity described within other sections of the permit application.

The capacity of the container storage area has been revised to maintain consistency with the capacity described within other sections of the permit application.

DAMES & MOORE A PROFESSIONAL LIMITED PARTNERSHIP
644 LINN STREET, SUITE 501, CINCINNATI, OHIO 45203 (513) 651-3440

March 20, 1991

U.S. EPA
RCRA Activities-Part B Application
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Lisa Pierard

Gentlemen:

Re: GMC Delco Products
Dayton Operations
RCRA Part B Permit Application
OHD 000 817 023

On behalf of GMC Delco Products, Dames & Moore is submitting the enclosed response to Ohio Environmental Protection Agency (OEPA) comments regarding the above referenced facility. The comments were transmitted to Delco Products in a January 17, 1991 letter from OEPA. The response is formatted as requested in the letter (i.e., new material in capital letter, removed material overstruck). Also enclosed is a written item by item response to each comment. We recommend that this be inserted in the front of the permit application. The pages enclosed are either replacement pages for those currently in the permit application or brand new pages that need to be inserted.

If you have any questions or comments regarding these responses please direct them to Mr. Richard Webster at (513) 455-3080.

Very truly yours

DAMES & MOORE

Linda E. Edwards
Associate

LEE/mh(20a)
00299-198-122

cc: T. Crepeau, Ohio EPA-DS HWM
H. O'Connell, Ohio EPA-SWDO

042-26

PART B REVIEW COMMENTS
GMC DELCO PRODUCTS-DAYTON
05-57-0317
OHD 000 817 023

PART A APPLICATION

1) Part A Application: Section A
OAC 3745-50-41; 3745-50-43;

Revise Form 3 of Part A Application: Section IX (page 4 of 5) to be consistent with facility owner information provided within Box A of Section VIII.

Page 4 of 5, Section IX of Form 3 has been signed to be consistent with the facility owner information provided within Box A of Section VIII.

WASTE ANALYSIS PLAN

2) C-1 Chemical and Physical Analysis:
OAC 3745-54-13(A):

a) Replace EP Toxicity Procedure with the Toxicity Characteristic Leaching Procedure method on page C-2.

The EP Toxicity Procedure noted on page C-2 has been changed to the toxicity characteristic leaching procedure.

b) Review Table C-2 and Appendix C-1 to reflect composition of current hazardous waste streams generated by facility operations. Include analytical reports generated from examination of representative samples of each hazardous waste stream managed at the permitted storage area.

Table C-1, as well as all wastes lists presented in the application, have been revised to indicate the most current hazardous waste streams generated that will be stored in the permitted container storage area or in the tanks. Attachment C-1 has been prepared that provides the MSDS for the majority of the hazardous wastes generated currently at Delco Products. Former Table C-2 indicated wastes streams no longer generated at the plant therefore, Table C-2 should be removed from the application.

c) Delineate those processes responsible for the generation of all hazardous wastes at the facility and correlate such operations to their appropriate analytical reference numbers.

Table C-1 has been revised to indicate the generation points for the individual waste streams.

d) Provide the rationale employed when deciding which EPA waste codes are appropriate for application to any of those hazardous wastes managed at the facility.

As described in Section C.1 under Waste Analyses, the classification (i.e. EPA waste codes) is based on known parameters of the waste for characteristic wastes: ignitability, reactivity, corrosivity and toxicity. This information is obtained from reference materials (i.e. MSDS) for the various materials used and a knowledge of the onsite manufacturing processes into which the materials are fed that may affect the generated waste streams. In addition, generated spent or off specification materials are compared to listed hazardous wastes described in OAC 3745-51-33 to establish EPA wastes codes. These determinations are then periodically verified with laboratory analyses as presented in Appendix C-1. This information has been added to Section C.1. A logic flow diagram used by plant personnel is presented in Attachment C-2.

3. *C-1b Waste in Tank Systems:*
OAC 3745-54-13(B)(1):

a) Elaborate upon the applied methodology for determining which of those containerized hazardous wastes received at the container storage area are transferred into the 7,000 gallon tank for further management.

Only wastes that are ignitable (D001 or F003 and F005) are put in the tank. If the wastes are too viscous or do not contain excessive insolubles they are not put in the tank. These conditions are determined by the processes that generate them and the operators' knowledge of these characteristics.

b) Describe the criteria applied when determining the appropriateness of all offsite sources which are considered to receive and conduct subsequent management of the facility's hazardous waste. (e.g., whether those wastes within the tank system are destined to be recycled (fuels blending) or are to be destroyed in an offsite hazardous waste incinerator.

Prior to offsite shipment, Delco Products evaluates disposal/treatment options based on its waste streams. This includes evaluating whether a waste is land-banned. Licensed TSDFs are contacted and evaluation samples are collected by the contractors. Whether a waste shipment goes to a particular TSDF is based on this analyses. This information has been added to page C-1.

PROCESS INFORMATION

4) *D-1A (2) Container Management Practices:*
OAC 3745-55-73

Illustrate those routes utilized within the facility for transporting hazardous wastes from the various satellite accumulation areas to the long-term storage area.

A figure has been generated which indicates the route utilized with the facility for transporting the waste. It is presented as an attachment to Section D.

5) ***D-2d(1)(c) Requirements for External Liner:***
OAC 3745-55-93(E)(1)(c)

Provide information as to the timeframe envisioned by facility representatives when the installation of chemical resistant water stops and impermeable coating will be completed to demonstrate the GMC Delco Dayton facility's compliance with OAC 3745-55-93(E)(1)(c). In addition, provide manufacturer's specification detailing the chemical composition of those materials utilized for coating the secondary containment structure.

Delco Products has already installed the chemical resistant waterstops and impermeable coating. The specifications for these materials are presented in Attachment D-2.

CONTINGENCY PLAN

6) ***G-3 Implementation***
OAC 3745-54-42(A); 3745-54-56(A)

A provision of this section (page G-2) refers to "spills in which a significant quantity of waste material has reached a sewer or public waterway or has the potential of causing contamination." GMC Delco must be more specific in what constitutes a "significant release" of hazardous waste. The contingency plan must describe under what specific conditions the plan will be implemented and how the plan will be implemented.

The contingency plan cannot possibly present every scenario that would require its implementation. Instead, it relies on trained personnel making the judgment on a case-by-case basis. This provision has been used and approved in other recently permitted TSDs in the Dayton area. The section has been revised to indicate that trained personnel will make the decision based on each situation.

7) ***G-4f Storage and Treatment of Released Materials:***
OAC 3745-54-56(G)

GMC Delco must provide information on how and where hazardous materials resulting from the emergency will be treated, stored and disposed of.

How hazardous materials resulting from an emergency will be treated, stored, and disposed of is described in existing Section G.4.f page G-8, Revision: 1, September 4, 1990. The text has been revised to state that either the existing storage area will be used for storage or, a temporary accumulation area operated in accordance with OAC 3745-52-34 will be maintained.

8) ***G-4g Incompatible Waste:***
OAC 3745-50-44(A)(7); 3745-54-56

GMC Delco must submit information on <u>what</u> measures will be taken to ensure that no incompatible wastes are treated, stored or disposed of upon a release of hazardous waste.

Section G.4.g has been revised to describe what measures will be taken to ensure that no incompatible released wastes are stored in the affected area.

Donna

OhioEPA

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

CERTIFIED MAIL

January 17, 1991

RE: GMC-Delco (Dayton)
Re # OHD 000 817 023
OHIO 05-57-0317

Richard Webster
GMC Delco Products
P.O. Box 1224
Dayton, Ohio 45401

Dear Mr. Webster:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in.

As you may know, Ohio has been delegated authority to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing Resource Conservation and Recovery Act (RCRA) permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendments of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately regardless of a State's authorization status, USEPA will continue to implement the applicable HSWA requirements. In other words under HSWA, there will continue to be a dual State-Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, USEPA will continue to administer and enforce those portions of HSWA in Ohio (which may include the issuance of full or partial permits) until Ohio receives authorization to do so. And until that time, Ohio will continue to assist USEPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a technical adequacy review of your Part B application and has determined it to be inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

042-25(1)

We have enclosed technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 55 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.

2. New language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Harold O'Connell
Ohio EPA, Southwest District Office
40 South Main Street
Dayton, Ohio 45402

Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V 5HR-13
230 South Dearborn Street
Chicago, Illinois 60604

In the course of the technical adequacy review, we may request additional information from you, if it is necessary to clarify, modify or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the application for a renewal permit, 3) pursuit of formal enforcement alternatives.

If you have any questions concerning the review of the permit application, or the level of detail we expect, please do not hesitate to contact Harold O'Connell, SWDO, at (513)285-6094, or Mr. Alan Harness, CO, at (614)644-2944. We also recommend that the facility contact the above referenced person, and discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and applicants for permits for hazardous waste treatment, storage and disposal facilities. Ohio Revised Code 3734.42 requires every applicant to file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General.

Rules 109:6-1-01 to 109:6-1-04 were promulgated by the Attorney General to implement the background investigations program. These rules, effective March 3, 1989, provide that if you file a permit application on or after 180 days after the effective date of the rules, i.e., after September 3, 1989, then your application for a permit must be accompanied by the required disclosure statement.

Since you have filed a permit application before September 3, 1989, then your disclosure statement shall be filed with the Attorney General on or before the date specified in a written notice to be sent by the Attorney General in accordance with Ohio Revised Code 3734.42.

For information concerning Rules 109:6-1-01 to 109:6-1-04, the disclosure statements and the Attorney General's procedures for written notice, please contact Mr. Athan Vinolus at the Attorney General's Environmental Enforcement Section, at 30 East Broad Street, Columbus, Ohio 43215, or at (614)466-2766.

EPA will continue to process your application without a disclosure statement. The permit application and the findings made in accordance with Ohio Revised Code 3734.05(H)(1) and 3734.44 will form the basis for Ohio EPA's determination on the permit. After September 3, 1989, you will be required to file a disclosure statement with the Attorney General on or before the date to be specified in a written notice that will be sent to you pursuant to Ohio Revised Code 3734.42(E). An investigative report will be developed by the Attorney General and evaluated for the permit. Please be advised that future review of the investigative report and disclosure statement developed for this permit may form the basis for revocation of the permit, where applicable, pursuant to Ohio Revised Code 3734.45.

Yours truly,

Edwin Y. Lim, Manager
Engineering Section
Division of Solid and Hazardous Waste Management

1990S-54
EYL-AH-ljp

cc: Lisa Pierard, USEPA
Joel Morbito, USEPA
Alan Harness, CO, DSHWM, Ohio EPA
Harold O'Connell, SWDO, DSHWM, Ohio EPA
Central File

PART B REVIEW COMMENTS
GMC DELCO PRODUCTS - DAYTON
05-57-0317
OHD 000 817 023

PART A APPLICATION

1). Part A Application: Section A
OAC 3745-50-41; 3745-50-43;

Revise Form 4 of Part A application : Section IX (page 4 of 5) to be consistent with facility owner information provided within Box A of Section VIII.

WASTE ANALYSIS PLAN

2). C-1 Chemical and Physical Analyses:
OAC 3745-54-13(A);

a) Replace EP Toxicity Procedure with the Toxicity Characterisitic Leaching Procedure method on page C-2.

b) Revise Table C-2 and Appendix C-1 to reflect composition of current hazardous waste streams generated by facility operations. Include analytical reports generated from examination of representative samples of each hazardous waste stream managed at the permitted storage area.

c) Delineate those processes responsible for the generation of all hazardous wastes at the facility and correlate such operations to their appropriate analytical reference numbers.

d) Provide the rationale employed when deciding which EPA waste codes are appropriate for application to any of those hazardous wastes managed at the facility.

3). C-1b Waste in Tank Systems
OAC 3745-54-13(B)(1);

a) Elaborate upon the applied methodology for determining which of those containerized hazardous wastes received at the container storage area are transfered into the 7,000 gallon tank for further management.

b) Describe the criteria applied when determining the appropriateness of all off-site sources which are considered to receive and conduct subsequent management of the facility's hazardous waste. (e.g., whether those wastes within the tank system are destined to be recycled (fuels blending) or are to be destroyed in an off-site hazardous waste incinerator.

PROCESS INFORMATION

4) D-1A(2) Container Management Practices:
OAC 3745-55-73

Illustrate those routes utilized within the facility for transporting hazardous wastes from the various satellite accumulation areas to the long term storage area.

5) D-2d(1)(c) Requirements for External Liner:
OAC 3745-55-93(E)(1)(c)

Provide information as to the timeframe envisioned by facility representatives when the installation of chemical resistant water stops and impermeable coating will be completed to demonstrate the GMC Delco Dayton facility's compliance with OAC 3745-55-93(E)(1)(c). In addition, provide manufacturer's specification detailing the chemical composition of those materials utilized for coating the secondary containment structure.

CONTINGENCY PLAN

6) G-3 IMPLEMENTATION:
OAC 3745-54-42(A), 3745-54-56(A)

A provision of this section (page G-2) refers to "spills in which a significant quantity of waste material has reached a sewer or public waterway or has the potential of causing contamination." GMC Delco must be more specific in what constitutes a "significant release" of hazardous waste. The contingency plan must describe under what specific conditions the plan will be implemented and how the plan will be implemented.

7) G-4f Storage and Treatment of Released Materials:
OAC 3745-54-56(G)

GMC Delco must provide information on how and where hazardous materials resulting from the emergency will be treated, stored and disposed of.

8) G-4g Imcompatible Waste:
OAC 3745-50-44(A)(7), 3745-54-56

GMC Delco must submit information on what measures will be taken to ensure that no incompatible wastes are treated, stored or disposed of upon a release of hazardous waste.

9) G-4h Post Emergency Equipment Maintenance:
OAC 3745-54-56(G)

Describe the procedures to be employed for managing all rinseate generated as a result of decontamination activities conducted on the facilities post-emergency equipment.

10) G-4I Container Spills and Leakage:
OAC 3745-54-22(A)

Revise plan to include a reference to those procedures to be implemented for assuring that immediate removal of liquids which have accumulated as a result of any spillage and/or leakage from containers situated within the secondary containment structure will occur.

11) G-6 Coordination Agreement:
OAC 3745-54-52(C)

The plan must be revised to correctly list the current address of Ohio EPA's Southwest District Office, as listed in the coordinated agreements section (G.6; page G-11), to read:

Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402

12) G-7 Evacuation Plan:
OAC 3745-54-52(F)

GMC Delco will need to submit more detailed information on the emergency alarm system. Is the alarm system a single speaker set-up that can be clearly heard throughout the facility, or does each have its own emergency alarm speaker? Does the alarm have a direct connection with the local fire department, or will they be contacted by other means? What test will be performed to insure that the emergency alarm system is in good working order?

CLOSURE PLAN AND FINANCIAL REQUIREMENTS

13) I-1 Closure Plan:
OAC 3745-55-12

Revise the capacity of the container storage area related in Section I.1.5.2; page I-5 to maintain consistency with the capacity described within other sections of the permit application.

DAMES & MOORE A PROFESSIONAL LIMITED PARTNERSHIP
644 LINN STREET, SUITE 501, CINCINNATI, OHIO 45203 (513) 651-3440

September 4, 1990

Ohio EPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Drive
Columbus, Ohio 43266-0149

Attention: Edwin Y. Lim, Manager
Engineering Section
Division of Solid and Hazardous Waste Management

Gentlemen:

Re: GMC Delco Products
Dayton Operations
RCRA Part B Permit Application
OHD 000 817 023

On behalf of GMC Delco Products, Dames & Moore is submitting the enclosed response to Ohio Environmental Protection Agency (OEPA) comments regarding the above referenced facility. The comments were transmitted to Delco Products in a July 10, 1990 letter from OEPA. The response is formatted as requested in the letter (i.e., new material in capital letter, removed material overstruck). Also enclosed is a written item by item response to each comment. The pages enclosed are replacement pages for those currently in the permit application. The old pages should be thrown away.

If you have any questions or comments regarding these responses please direct them to Mr. Richard Webster at (513) 455-3203.

Very truly yours

DAMES & MOORE

Linda E. Edwards
Associate

LEE/mh(15)
00299-193-122

042-25

PART B REVIEW COMMENTS
GMC DELCO PRODUCTS - DAYTON
05-57-0317
OHD 000 817 023

1. ***Part A Application:***
OAC 3745-50-41; 3745-50-43;

The Part A application mentions a request for storage capacity of 12,500 gallons, but Section D.1.a.(1) mentions that the "maximum inventory of containers stored in the container storage area at any given time is not to exceed 228 drums," totaling 12,540 gallons. If 228 55-gallon drums are requested to be stored at the facility, the Part A application should be revised to request only 12,540 gallon storage capacity.

The Part A application has been revised to reflect the 12,540 gallon total storage capacity of the container storage area.

2. ***C-1 Chemical and Physical Analyses:***
OAC 3745-54-13(A);

Table C-1 does not list waste code D006 and D011 which appear on the Part A permit application. Revise section accordingly.

The Part A permit application has been revised to eliminate the D006 and D011 waste codes. The wastes with these waste codes are no longer generated and stored at the facility. Table C-1 and the Part A permit application are now consistent.

3. ***C-2a Parameters & Rationale:***
OAC 3745-54-13(B)(1);

Demonstrate how those analytical parameters examined within the existing waste analysis plan account for screening of those non-specific source wastes listed within OAC 3745-51-31.

The waste analysis plan has been revised in Table C-3 to include the analysis for the F-Listed solvents using SW-846 method 8240. This methodology and/or generator knowledge will be used to screen for those non-specific source wastes listed in OAC 3745-51-31. As indicated in revised Section C.2.a., where a waste could be listed under more than one waste code (e.g., D001 or F001 or F002), Delco Products will utilize generator knowledge to correctly classify the waste.

4. ***C-2b Test Methods:***
OAC 3745-54-13(B)(2);

Reference the analytical test method utilized to identify the presence of solvent constituents (F series) within wastes generated at the facility.

The waste analysis plan has been revised in Table C-3 to include the analysis for the F-Listed solvents using SW-846 method 8240.

5. ***C-3a(1) Waste Characteristics: Solvent Wastes and Dioxin-Containing Wastes:***
OAC 3745-59-30; 40 CFR Part 268;

Supply analytical data or generator information used to determine if F001-F005 solvent wastes are generated and whether such wastes would meet those treatment standards established within OAC 3745-59-41 and 40 CFR 268.41.

As indicated in Table C-1, F001, F002, F003, and F005 wastes are generated at the facility. Table C-1 also references waste analyses sheets contained in Appendix C-1 for the wastes. Analysis reference numbers 1 and 60 provide analytical data on the F-listed wastes and the bulk tank solvents are identified as F003 and F005 based on knowledge of what is put in the tank. Where analysis is not available to determine if the wastes would meet the land disposal restriction treatment standards, Delco Products assumes that they do not meet the standards and indicates as such in a certification accompanying the waste manifests.

6. ***C-3a(2) Waste Characteristics: California List Wastes:***
OAC 3745-59-32; 40 CFR Part 268;

Supply analytical data or generator information used to determine the following: a) if any liquid wastes possess a concentration of one or more California list constituents at or above level specified within HSWA Section 3004(d), or b) if any liquid or nonliquid wastes generated possess a concentration of halogenated organic carbons (HOCs) at or above 1,000 mg/kg.

As indicated in revised Section C.3, Dayton Operations assumes that wastes containing constituents subject to Land Disposal Restrictions (includes California list and HOCs) do not meet treatment standards unless analytical data indicates otherwise. Those wastes determined to be "land-banned" either by assumption or by analysis, are indicated as such with each manifest accompanying the waste.

7. ***D-1a(2) Container Management Practices:***
OAC 3745-55-73(B);

Describe the method(s) employed for transferal of waste containers to the HWMF from satellite areas within the plant. List associated equipment used in transporting containers to the HWMF area.

Containers from the satellite areas located west of Abbey Avenue (Hill Plant) are loaded on tractor/trailer trucks via forklift and are transported to the HWMF where they are unloaded by forklift. Containers from the satellite areas of the main plant are transported to the HWMF by forklift trucks only. This information has been added to Section D.1.a.(2).

8. ***D-1a(3)(e) Removal of Liquids from Containment System: OAC 3745-55-75;***

Substantiate that semi-annual removal of liquids within the secondary containment system's underground tank is as timely as necessary in order to prevent overflow of liquids within the collection system.

Section D.1.a(3)(e) has been revised to state that the 2,000 gallon containment structure is pumped approximately every two weeks. This schedule is sufficient to prevent overflow from accumulated mop water and rain runoff. Any spills that may occur will also result in pumping the structure, as appropriate.

9. ***D-2a(2) Description of Feed Systems, Safety Cutoff, Bypass Systems, and Pressure Controls: OAC 3745-55-90;***

Describe the procedure utilized for removal of waste liquids already introduced into Tank #1 in the event that the waste assessment process indicates material is unsuitable for pumping to Tank #2 (addressed within Section D.2d of application).

Section D.2.d now addresses the procedure for wastes in Tank No. 1 that are found to be unsuitable for pumping to Tank No. 2. These wastes will be pumped from Tank No. 1 into drums. If the unsuitable waste is contaminated (a different characteristic from waste in Tank No. 2), Tank No. 1 will be rinsed and the rinsate also pumped into drums.

10. ***D-2d(1)(c) Requirements for External Liner, Vault, Double-Walled Tank or Equivalent Device: OAC 3745-55-93(E)(2);***

a. Document that the secondary containment structures current integrity has prevented permeation of waste liquids to surrounding soils via joints currently not treated with chemical resistant water stops. Document if existing vault structure is free of cracks and/or gaps.

As stated in Section D.2.f.(1)(c), Delco Products is in the process of installing chemical resistant water stops and an impermeable coating on the interior surface of the vault. These measures will prevent the permeation of liquid wastes to the surrounding soils by sealing any cracks or gaps. Section D.2.f.(1)(c) now states that there is no evidence that waste liquids have permeated to the surrounding soils and there have been no major spills in the waste storage area to date.

b. Specify the methodology employed in assuring against the formation and potential ignition of vapors present in the underground tank.

As stated in Section D.2.f.(1)(c), Delco Products is in the process of upgrading the underground tank to assure against the formation and potential ignition of vapors. These upgrades include the following:

- Venting of the tank in accordance with Ohio Plumbing Code 4101;2-51-24 Interceptors to prevent against the formation of vapors

- A no smoking sign be clearly posted in the area as a precaution against the potential ignition of any vapors

11. F-2b(2)(a) Tank System External Corrosion and Releases: OAC 3745-55-95(B)9(1);

Substantiate facility's compliance in inspecting all above-ground portions of the tank system on a daily, rather than weekly, basis, as indicated within Table F-1.

Table F-1 has been revised to indicate that the tank's concrete curb, base, foundation, shell, walls, supports, pipes, valves, fittings, and barrel dumpers will be inspected daily.

12. F-2b(2)(b) Tank System Construction Materials and Surrounding Area: OAC 3745-55-95(B);

Substantiate facility's compliance in conducting inspections of all tank construction materials on a daily, rather than weekly, basis, as indicated within Table F-1.

Table F-1 has been revised to indicate that the tank's concrete curb, base, foundation, shell, walls, supports, pipes, valves, fittings, and barrel dumpers will be inspected daily.

13. F-3(a)(4) Water for Fire Control: OAC 3745-54-32(D);

Document that available water supplies are of adequate volume and pressure for fire fighting purposes in the event that such incident were to occur within the facility.

Table F-2, which is referenced in Section F.3, has been revised to indicate that when the fire pump is running, 510 gallons per minute can be delivered at a pressure of 125 pounds. All connections are checked every three years.

14. F-4b Runoff: OAC 3745-50-44;

Detail the decision-making process employed, along with those reference materials available for examination, when characterizing liquids discovered within the containment system.

Section F.4.b now states that a determination of the nature of runoff discovered within the containment system will be made considering the most likely source (i.e. map water, rain water, or spills). If the runoff contains liquids from a spill, the runoff will be characterized by the constituents of the spill. If the hazardous nature of the spill is unknown, a sample of the runoff will be collected from the 2,000 gallon containment structure for analysis.

15. G-2 Emergency Coordinators:

Address wording/typographical error within second sentence at the top of page G-2.

Page G-2 has been revised to correct the wording and typographical error.

16. G-4b Identification of Hazardous Materials: OAC 3745-54-56(B);

Describe the methodology employed, along with references utilized, in identifying the character, source, amount, and areal extent of any release(s) which occur within the facility.

Section G-4 has been revised to state that the coordinator will determine the character of the waste stream by checking labels and MSDS for constituents. If an unknown and unidentified waste stream is discovered a sample will be collected and analyzed. The source of the hazardous waste released will be determined by inspecting the drums and tanks. Observation of the containers, inspection forms and manifest will be used to determine the amount of the release. The areal extent of any such release will be primarily assessed by visual observation, however, sampling and analysis will be conducted if necessary to determine the extent of waste released to ground and surface water and soil.

17. G-4c Assessment: OAC 3745-54-56(C);

Describe the criteria used to assess possible hazards to human health and/or the environment as a result of a fire, release, or explosion, and the need for evacuation and notification of the proper authorities.

The coordinator will assess possible hazards to human health/or the environment as a result of a fire, release, or explosion by identifying the specific nature of the incident, the source, type and volume of hazardous waste involved, the areal extent of the contamination, the time of day, weather conditions and location of emergency. The need for evacuation and notification of the proper authorities will be based on whenever there is an imminent or actual emergency situation. This information has been added to Section G.4.c.

18. G-4f Storage and Treatment of Released Material: OAC 3745-54-56(G);

Describe those disposal options available for waste liquids/residues generated from spill response activities which have been collected and containerized for offsite removal.

Section G-4f has been revised to state that recovered containerized spill material will be characterized to determine if it is hazardous waste. If hazardous, it will be disposed of following the existing arrangements for disposal of hazardous waste to a secure offsite facility. Note that all disposal options will be in accordance with applicable land disposal restrictions.

19. G-4h Post Emergency Equipment Maintenance:
OAC 3745-54-56(H);

Detail disposal options available for non-reusable equipment contaminated during remedial activities.

Section G-4h has been revised to state that, if not decontaminated and if it meets the definition of hazardous waste, non-reusable equipment, such as brooms, is to be disposed of offsite as a hazardous waste or at RCRA-permitted facility.

20. G-4i Container Spills and Leakage:
OAC 3745-54-52(A);

Describe the methodology to be employed when in pursuit of disposal options for the contents of the underground tank in the event that any spilled liquids characterized as hazardous waste are flushed to the secondary containment system.

Section G-4i has been revised to state that hazardous waste flushed to the secondary containment system will be analyzed, if the source of the release is not known. Upon receipt of analyses, waste will be disposed of properly using existing hazardous waste disposal arrangements to a secure offsite facility. Note that all disposal options will be in accordance with applicable land disposal restrictions.

21. I-1c Maximum Waste Inventory:
OAC 3745-50-44(A)(13); 3745-55-12(B)(3);

The maximum waste inventory of containers stored in the storage area is 228 drums, not 112 as mentioned on page I-12. Closure must be based upon maximum waste inventory consideration.

Section I-1 has been revised to reflect the maximum waste inventory of 228 drums.

22. I-1e(2) Disposal or Decontamination of Equipment, Structures, and Soils:
OAC 3745-55-11;

Stipulate that within the soil sampling and testing plan section of the amended closure plan the facility will commit to one of the two clean closure options available for naturally occurring elements or compounds, as specified within the Ohio EPA Closure Review Guidance (February 8, 1988).

As indicated in revised Section 1.2.3.4., soils will be considered clean when they meet the higher of the following:

- Health/Risk-based Levels
- Background
- Practical Quantitation Limits

23. ***I-3a Certification of Closure: OAC 3745-55-15;***

Correct OAC citation signifying owner/operator certification statement contained within 3745-55-15.

The OAC citation signifying owner/operator certification statement contained within 3745-55-15 has been added to Section I-3a.

24. ***I-4 Closure Cost Estimate: OAC 3745-55-42;***

Review closure cost estimate to account for removal/disposal of maximum permitted waste inventory, consisting of 12,550-gallon container and 7,000-gallon tank storage capacities.

Section I-4 as well as Table I-4 have been revised to reflect the closure cost estimate for the maximum permitted waste inventory of 12,540 gallon containers (228 drums) and 7,500 gallon tank storage and capacity. Note that the total capacity of the storage tanks was inaccurately shown as 7,000 gallons on the OEPA NOD letter.

25. ***J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS***

Technical Adequacy review of this portion of the permit application will commence upon receipt of additional information from the facility, as requested for submittal to U.S. EPA, Region V.

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020 **Fax** (614) 644-2329

Richard F. Celeste
Governor

CERTIFIED MAIL

RE: GMC Delco Dayton
Re# OHD000817023
OHIO 05-57-0317

July 10, 1990

Richard Webster
GMC Delco Products Dayton Operations
P.O. Box 1224
Dayton, Ohio 45401

Dear Mr. Webster:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in.

As you may know, Ohio has been delegated authorization to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing Resource Conservation and Recovery Act (RCRA) permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendments of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately, regardless of a State's authorization status, U.S. EPA will continue to implement the applicable HSWA requirements. In other words, under HSWA there will continue to be a dual State/Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, U.S. EPA will continue to administer and enforce those portions of HSWA (which may include the issuance of full or partial permits) until Ohio receives authorization. Until that time, Ohio will continue to assist U.S. EPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a technical adequacy review of your Part B application and has determined it to be inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and pursuant to the corresponding Federal regulations.

042-23

We have enclosed technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 55 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.

2. New language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Harold O'Connell
Ohio EPA, Southwest District Office
40 South Main Street
Dayton, Ohio 45402

Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V
Chicago, Illinois 60690-3587

In the course of the technical adequacy review, we may request additional information if it is necessary to clarify, modify, or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in (1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, (2) denial of the application for renewal permit, or (3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.

If you have any questions concerning the review of the permit application, or the level of detail expected, please do not hesitate to contact Harold O'Connell at (513) 285-6357. We also recommend that the facility contact the above referenced person, and discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and permit applicants for hazardous waste treatment, storage and disposal facilities. Ohio Revised Code 3734.42 requires every applicant to file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General.

Rules 109:6-1-01 to 109:6-1-04 were promulgated by the Attorney General to implement the background investigations program. These rules, effective March 3, 1989, provide that if a permit application is filed on or after 180 days of the effective date of the rules, i.e., <u>after</u> September 3, 1989, then the application for a permit must be accompanied by the required disclosure statement.

Since you have filed a permit application <u>before</u> September 3, 1989, then your disclosure statement shall be filed with the Attorney General on or before the date specified in a written notice to be sent by the Attorney General in accordance with Ohio revised code 3734.42.

For information concerning Rules 109:6-1-01 to 109:6-1-04, the disclosure statements, and the Attorney General's procedures for written notice, please contact Mr. Athan Vinolus at the Attorney General's Environmental Enforcement Section, 30 East Broad Street, Columbus, Ohio 43215 or at (614) 466-2766.

Ohio EPA will continue to process your application without a disclosure statement. The permit application and the findings made in accordance with Ohio Revised Code 3734.05(H)(1) and 3734.44 will form the basis for Ohio EPA's determination on the permit. An investigative report will be developed by the Attorney General and evaluated for the permit. Please be advised that future review of the investigative report and disclosure statement developed for this permit may form the basis for revocation of the permit, where applicable, pursuant to Ohio Revised Code 3734.45.

Sincerely,

Edwin Y. Lim

Edwin Y. Lim, Manager
Engineering Section
Division of Solid and Hazardous Waste Management

EYL/fjb

cc: Lisa Pierard, U.S. EPA
Joel Morbito, U.S. EPA
Robert F. Babik, CO, DSHWM, Ohio EPA
Frank J. Basting, CO, DSHWM, Ohio EPA
Harold O'Connell, SWDO, DSHWM, Ohio EPA
Central File

PART B REVIEW COMMENTS
GMC DELCO PRODUCTS - DAYTON
05-57-0317
OHD 000 817 023

1). Part A Application:
OAC 3745-50-41; 3745-50-43;

The Part A application mentions a request for storage capacity of 12,550 gallons, but Section D.1.a.(1) mentions that the "maximum inventory of containers stored in the container storage area at any given time is not to exceed 228 drums", totaling 12,540 gallons. If 228 55-gallon drums are requested to be stored at the facility the Part A application should be revised to request only 12,540 gallon storage capacity.

2). C-1 Chemical and Physical Analyses:
OAC 3745-54-13(A);

Table C-1 does not list waste code D006 and D011 which appear on the Part A permit application. Revise section accordingly.

3). C-2a Parameters & Rationale:
OAC 3745-54-13(B)(1);

Demonstrate how those analytical parameters examined within the existing waste analysis plan account for screening of those non-specific source wastes listed within OAC 3745-51-31.

4). C-2b Test Methods:
OAC 3745-54-13(B)(2);

Reference the analytical test method utilized to identify the presence of solvent constituents (F series) within wastes generated at the facility.

5). C-3a(1) Waste Characteristics: Solvent Wastes and Dioxin-Containing Wastes:
OAC 3745-59-30; 40 CFR Part 268;

Supply analytical data or generator information used to determine if F001-F005 solvent wastes are generated and whether such wastes would meet those treatment standards established within OAC 3745-59-41 and 40 CFR 268.41.

6). C-3a(2) Waste Characteristics: California List Wastes:
OAC 3745-59-32; 40 CFR Part 268;

Supply analytical data or generator information used to determine the following: a) if any liquid wastes possess a concentration of one or more California list constituents at or above level specified within HSWA Section 3004(d), or b) if any liquid or non-liquid wastes generated possess a concentration of halogenated organic carbons (HOC's) at or above 1000 mg/kg.

7). D-1a(2) Container Management Practices:
OAC 3745-55-73(B);

Describe the method(s) employed for transferal of waste containers to the HWMF from satellite areas within the plant. List associated equipment used in transporting containers to the HWMF area.

8). D-1a(3)(e) Removal of Liquids from Containment System:
OAC 3745-55-75;

Substantiate that semi-annual removal of liquids within the secondary containment system's underground tank is as timely as necessary in order to prevent overflow of liquids within the collection system.

9). D-2a(2) Description of Feed Systems, Safety Cutoff, Bypass Systems and Pressure Controls:
OAC 3745-55-90;

Describe the procedure utilized for removal of waste liquids already introduced into Tank #1 in the event that the waste assessment process indicates material is unsuitable for pumping to Tank #2 (addressed within Section D.2d of application).

10). D-2d(1)(c) Requirements for External Liner, Vault, Double Waled Tank or Equivalent Device:
OAC 3745-55-93(E)(2);

a. Document that the secondary containment structures current integrity has prevented permeation of waste liquids to surrounding soils via joints currently not treated with chemical resistant water stops. Document if existing vault structure is free of cracks and/or gaps.

b. Specify the methodology employed in assuring against the formation and potential ignition of vapors present in the underground tank.

11). F-2b(2)(a) Tank System External Corrosion and Releases:
OAC 3745-55-95(B)(1);

Substantiate facility's compliance in inspecting all above-ground portions of the tank system on a daily, rather than weekly basis, as indicated within Table F-1.

12). F-2b(2)(b) Tank System Construction Materials and Surrounding Area:
OAC 3745-55-95(B);

Substantiate facility's compliance in conducting inspections of all tank construction materials on a daily, rather than weekly basis, as indicated within Table F-1.

13). F-3(a)(4) Water for Fire Control:
OAC 3745-54-32(D);

Document that available water supplies are of adequate volume and pressure for fire fighting purposes in the event that such incident were to occur within the facility.

14). F-4b Run-off:
OAC 3745-50-44;

Detail the decision-making process employed, along with those reference materials available for examination, when characterizing liquids discovered within the containment system.

15). G-2 Emergency Coordinators:

Address wording/typographical error within second sentence at the top of page G-2.

16). G-4b Identification of Hazardous Materials:
OAC 3745-54-56(B);

Describe the methodology employed, along with references utilized, in identifying the character, source, amount, and areal extent of any release(s) which occur within the facility.

17). G-4c Assessment:
OAC 3745-54-56(C);

Describe the criteria used to assess possible hazards to human health and/or the environment as a result of a fire, release, or explosion, and the need for evacuation and notification of the proper authorities.

18). G-4f Storage and Treatment of Released Material:
OAC 3745-54-56(G);

Describe those disposal options available for waste liquids/residues generated from spill response activities which have been collected and containerized for offsite removal.

19). G-4h Post Emergency Equipment Maintenance:
OAC 3745-54-56(H);

Detail disposal options available for non-reusable equipment contaminated during remedial activities.

20). G-4i Container Spills and Leakage:
OAC 3745-54-52(A);

Describe the methodology to be employed when in pursuit of disposal options for the contents of the underground tank in the event that any spilled liquids characterized as hazardous waste are flushed to the secondary containment system.

21). I-1c Maximum Waste Inventory:
OAC 3745-50-44(A)(13); 3745-55-12(B)(3);

The maximum waste inventory of containers stored in the storage area is 228 drums, not 112 as mentioned on page I-12. Closure must be based upon maximum waste inventory consideration.

22). I-1e(2) Disposal or Decontamination of Equipment, Structures, and Soils:
OAC 3745-55-11;

Stipulate that within the soil sampling and testing plan section of the amended closure plan the facility will commit to one of the two clean closure options available for naturally occurring elements or compounds, as specified within the Ohio EPA Closure Review Guidance (February 8, 1988).

23). I-3a Certification of Closure:
OAC 3745-55-15;

Correct OAC citation signifying owner/operator certification statement contained within 3745-55-15.

24). I-4 Closure Cost Estimate:
OAC 3745-55-42;

Revise closure cost estimate to account for removal/ disposal of maximum permitted waste inventory, consisting of 12,550 gallon container and 7,000 gallon tank storage capacities.

25). J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

Technical Adequacy review of this portion of the permit application will commence upon receipt of additional information from the facility, as requested for submittal to USEPA, Region V.

HO/fjb
7/5/90

Delco Products

Delco Products Division
General Motors Corporation
Dayton Operations
Post Office Box 1224
Dayton, Ohio 45401-1224

April 27, 1990

Mr. Don Heller
U.S. EPA - Region 5
Ohio Section
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Heller:

Per our phone conversation on April 27, please find enclosed information on our underground storage tank program (Registration Permit Application for Underground Storage Tanks).

I have recently been advised that we do have information pertaining to soil profile for a proposed tank farm unrelated to the UST program. I made the statement in our meeting that information of this type was not available. I am enclosing the soil boring log for this tank farm project.

I have also included reports of the releases and current status of the underground storage tanks for your information. I apologize for my inability to provide this information at the time of the inspection.

A copy of the documentation will be sent to Mr. Harold O'Connell of the Ohio EPA Southwest District Office.

Thank you for your patients both during and after the RCRA VSI visit.

Respectfully yours,

Tom Jelenek

Tom Jelenek

Delco Products

Delco Products Division
General Motors Corporation
Dayton Operations
Post Office Box 1224
Dayton, Ohio 45401-1224

February 06, 1990

Mr. Mike Dalton
Emergency Response Section
Ohio Environmental Protection Agency
P.O.Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266

Dear Mr. Dalton,

Delco Products Division, General Motors Corporation, is in the process of closing all underground storage tanks (USTs) located at it's Dayton, Ohio facilities. Eleven (11) of these USTs, from three (3) excavations, were removed during December 1989. As part of the closure, soil samples were obtained and analyzed for total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). In at least one sample from each excavation, TPHs or VOCs were detected. It was in this analysis that a release was confirmed and reported according to the Ohio Bureau of Underground Storage Tank Regulations (BUSTR).

Heritage Remediation/Engineering, Inc. of Indianapolis, Indiana is the UST removal contractor. Notification was called into the local fire department, the State Fire Marshal Office, the NRC, and to the OEPA on January 10th, 1990. The OEPA report number is 1-57-0144.

As part of the release reporting requirements, a 20 day report is here-by submitted showing the status of each tank and what action have been taken. See attached "Initial Response Summary Report". Within 45 days of the reported releases, we will submit a detailed workplan for site investigation of each cavity.

If you have any questions or require additional information, please give me a call on 513/455-3081. Thank you.

Sincerely,
Dayton Plant Operations
Delco Products Division
General Motors Corporation

G. Brent Lange
Sr. Environmental Engineer

CC File
State Fire Marshal Office

NITIAL RESPONSE SUMMARY REPORT
ELCO PRODUCTS DAYTON OPERATIONS ----- UNDERGROUND STORAGE TANKS
ONFIRMED RELEASE OF 01-10-90

TANK N°	CAVITY NO.	CAPACITY (GAL)	MOST RECENT PRODUCT	DATE INSTALLED	DATE REMOVED FROM GROUND	AVERAGE CONCENTRATION	INITIAL RESPONSE
10.	101	12,000	GASOLINE	JAN. 1958	12-18-89	158 PPB	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
111	111-112	4,000	DIESEL FUEL	JAN. 1973	12-08-89	3 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
112	111-112	12,000	GASOLINE	JAN. 1973	12-12-89	47 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
118A	118-121	2,400	DOWANOL	JAN. 1963	12-20-89	24,500 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
118B	118-121	2,400	TOLUENE	JAN. 1963	12-20-89	24,500 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
118C	118-121	2,400	BUTYL ACETATE	JAN. 1963	12-20-89	24,500 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
118D	118-121	2,400	BUTYL ACETATE	JAN. 1963	12-20-89	24,500 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
118E	118-121	2,400	GLYCOL	JAN. 1963	12-20-89	24,500 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
119	118-121	25,000	XYLENE	JAN. 1974	12-20-89	16 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
120	118-121	12,000	XYLENE	JAN. 1963	12-20-89	21,085 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
121	118-121	12,000	XYLENE	JAN. 1963	12-20-89	717 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL

Delco Products

Delco Products Division
General Motors Corporation
Dayton Operations
Post Office Box 1224
Dayton, Ohio 45401-1224

November 16, 1989

Mr. Mike Dalton
Emergency Response Section
Ohio Environmental Protection Agency
P.O.Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266

Dear Mr. Dalton,

Delco Products Division, General Motors Corporation, is in the process of closing all underground storage tanks (USTs) located at it's Dayton, Ohio facilities. Fourteen (14) of these USTs, from seven (7) excavations, have been removed to date. As part of the closure, soil samples were obtained and analyzed for total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). In at least one sample from each excavation, TPHs or VOCs were detected. It was in this analysis that a release was confirmed and reported according to the Ohio Bureau of Underground Storage Tank Regulations (BUSTR).

Heritage Remediation/Engineering, Inc. of Indianapolis, Indiana is the UST removal contractor. Notification was called into the local fire department, the State Fire Marshal Office, the NRC, and to the OEPA on October 19th and 20th, 1989. The OEPA report number is 10-57-4046.

As part of the release reporting requirements, a 20 day report is here-by submitted showing the status of each tank and what action have been taken. See attached "Initial Response Summary Report". Within 45 days of the reported releases, we will submit a detailed workplan for site investigation of each cavity.

If you have any questions or require additional information, please give me a call on 513/455-3081. Thank you.

Sincerely,
Dayton Plant Operations
Delco Products Division
General Motors Corporation

G. Brent Lange

G. Brent Lange
Sr. Environmental Engineer

CC File
State Fire Marshal Office

Soil Study for Proposed Tank Farm, West Third Street, Dayton, Ohio

For

General Motors Corporation
Delco Products Division
P.O. Box 1224, Mail Code 04-12
Dayton, Ohio 45401

Report No. 51001-1089-750

October 12, 1989

BOWSER MORNER

INITIAL RESPONSE SUMMARY REPORT
DELCO PRODUCTS DAYTON OPERATIONS ----- UNDERGROUND STORAGE TANKS
CONFIRMED RELEASE OF 10-19-89

TANK NO.	CAVITY NO.	CAPACITY (GAL)	MOST RECENT PRODUCT	DATE INSTALLED	DATE REMOVED FROM GROUND	AVERAGE CONCENTRATION	INITIAL RESPONSE
102	102-109	1,000	TRICHLOROETHANE	JAN. 1961	10-3-89	1502 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
103	102-109	1,000	ALCOHOL	JAN. 1961	10-3-89	243 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
104	102-109	1,000	MEK	JAN. 1961	10-3-89	50 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
105	102-109	1,000	PERCHLOROETHANE	JAN. 1961	10-3-89	831 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
106	102-109	2,000	TRICHLOROETHANE	JAN. 1961	10-2-89	36 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
107	102-109	2,000	MEK	JAN. 1961	10-2-89	226 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
108	102-109	2,000	MEK	JAN. 1961	10-2-89	1213 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
109	102-109	2,000	MINERAL SPIRITS	JAN. 1961	10-2-89	50 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
110	110	6,000	CHLOROFORM	JAN. 1968	10-2-89	844 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
113	113	550	GASOLINE	JAN. 1958	10-4-89	12 PPM	REMOVED UST, REMOVED OLD FILL, INSTALLED NEW FILL
115	115	12,000	FUEL OIL	JAN. 1977	10-6-89	33 PPM	REMOVED UST, REMOVED OLD FILL, INSTALLED NEW FILL
117	117	10,000	FUEL OIL	JAN. 1964	10-9-89	45 PPM	REMOVED UST, REMOVED OLD FILL, INSTALLED NEW FILL
127	127	18,000	FUEL OIL	JAN. 1959	10-3-89	39 PPM	REMOVED UST, REMOVED & STOCKPILED OLD FILL, INSTALLED NEW FILL
129	129	15,000	PROCESS OIL	JAN. 1959	10-9-89	6 PPM	REMOVED UST, REMOVED OLD FILL, INSTALLED NEW FILL

BOWSER MORNER

FOUNDED 1911

420 Davis Ave. • P.O. Box 51 • Dayton, OH 45401-0051 • 513/253-8805 • FAX 513/253-2016

October 12, 1989

General Motors Corporation
Delco Products Division
P.O. Box 1224, Mail Code 04-12
Dayton, Ohio 45401

Attention: Mr. Brent Lange

Re: Soil Study for Proposed Tank Farm, West Third Street, Dayton, Ohio

Gentlemen:

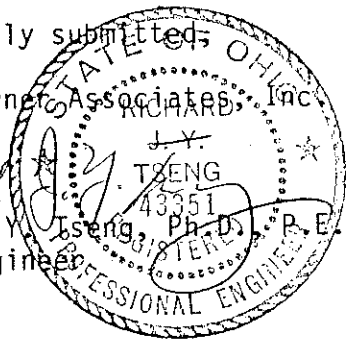
We are pleased to submit our report of the soil study at the above-referenced project in Dayton, Ohio.

The purpose of the study was to determine the physical characteristics of the soil strata and allowable bearing capacity for the proposed tank farm. Also to be noted were any conditions that would affect the design or construction of the proposed tank farm.

For your convenience the samples will be retained at this laboratory for a period of thirty days unless we are advised otherwise. If there are any questions or if we can be of further service, please contact us.

Respectfully submitted,

Bowser-Morner Associates, Inc.



Richard J.Y. Tseng, Ph.D., P.E.
Senior Engineer

RJYT/ads(#133)
3-Client
1-LJB Engineers-Architects
1563 East Dorothy Lane
Kettering, Ohio 45429
Attention: Mr. Mark H. Stemmer
2-File

LOG OF BORING NO. 1

SOIL STUDY FOR PROPOSED TANK FARM, WEST THIRD STREET, DAYTON, OHIO

BORING LOCATION: As shown on boring location plan DATE STARTED: 9/19/89

SURFACE ELEVATION: 100.3'* DATE COMPLETED: 9/19/89

STRATUM	DESCRIPTION OF MATERIAL	SAMPLE NO. & TYPE	SAMPLE DEPTH	BLOWS PER 6"	"N" BLOWS /Ft. OR CORE REC.
0.0'	(FILL) Asphalt pavement				
0.5'					
1.0'	(FILL) Gravel base				
3.0'	(ORIGINAL) Very stiff greenish-brown silt, some clay, some sand, trace gravel - damp	1A	1.0- 2.5	5- 8- 8	16
5'	Hard brown silt, some sand, some clay, trace gravel - moist	2A	3.5- 5.0	8-16-44	60
	(Some rock fragments at 4.8')	3A	6.0- 7.5	29-48-41	89
	(Trace rock fragments at 9.0')	4A	8.5-10.0	31-41-100/3"	100+
10'	Bottom of boring at 10.0'				
15'					
20'					
25'					
30'					

	WATER OBSERVATIONS	TYPE SAMPLER
METHOD: HOLLOW STEM AUGER	INITIAL DEPTH: None	X A. SPLIT-SPOON
TECHNICIAN: AR-SN	COMPLETION DEPTH: None	___ B.
JOB NO. 51001 mja(#203)	DEPTH AFTER: ___ HRS. ___	___ C. SHELBY TUBE

*In reference to assumed elevation of 100.0' for bench mark shown on boring location plan.

BOWSER MORNER

LOG OF BORING NO. 2

SOIL STUDY FOR PROPOSED TANK FARM, WEST THIRD STREET, DAYTON, OHIO

BORING LOCATION: As shown on boring location plan DATE STARTED: 9/19/89

SURFACE ELEVATION: 101.1'* DATE COMPLETED: 9/19/89

STRATUM	DESCRIPTION OF MATERIAL	SAMPLE NO. & TYPE	SAMPLE DEPTH	BLOWS PER 6"	"N" BLOWS /Ft. OR CORE REC.
0.0'	(FILL) Asphalt pavement				
0.5'	(FILL) Very stiff dark brown organic silt, some clay, trace sand, trace gravel - moist	1A	2.5- 4.0	3- 9-13	22
3.5'	(ORIGINAL) Hard brown silt, some clay, trace sand, trace gravel - moist	2A	5.0- 6.5	6-13-21	34
6.0'	Hard greenish brown silt, some sand, some clay, trace gravel - damp				
7.0'	Hard brown silt, some clay, some sand, trace gravel - damp	3A	7.5- 8.5	17-100/4"	100+
	(Trace rock fragments at 10.5')	4A	10.0-11.5	30-45-100/3"	100+
13.5'	Apparent rock	5A	13.5-14.5	100/1"	100+
	Bottom of boring at 14.0'				

	WATER OBSERVATIONS	TYPE SAMPLER
METHOD: HOLLOW STEM AUGER	INITIAL DEPTH: None	X A. SPLIT-SPOON
TECHNICIAN: AR-SN	COMPLETION DEPTH: None	B.
JOB NO. 51001 mja(#203)	DEPTH AFTER: ____ HRS. ____	C. SHELBY TUBE

*In reference to assumed elevation of 100.0' for bench mark shown on boring location plan.

BOWSER MORNER

LOG OF BORING NO. 3

SOIL STUDY FOR PROPOSED TANK FARM, WEST THIRD STREET, DAYTON, OHIO

BORING LOCATION: As shown on boring location plan DATE STARTED: 9/19/89

SURFACE ELEVATION: 103.5'* DATE COMPLETED: 9/19/89

STRATUM	DESCRIPTION OF MATERIAL	SAMPLE NO. & TYPE	SAMPLE DEPTH	BLOWS PER 6"	"N" BLOWS /Ft. OR CORE REC.
0.0'	(FILL) Asphalt pavement				
0.5'					
1.0'	(FILL) Granular base				
3.5'	(FILL) Stiff brown silt, some sand, some gravel - moist	1A	1.0- 2.5	4- 7- 8	15
5'	(ORIGINAL) Hard brown silt, some sand, some clay, some rock fragments - wet	2A	3.5- 5.0	22-49-47	96
	(Becomes damp at 6.0')	3A	6.0- 7.0	13-100/3"	100+
9.0'					
10'	SHALE, gray, weathered, horizontal bedding	4A	8.5- 9.5	68-100/5"	100+
	Bottom of boring at 9.5'				
15'					
20'					
25'					
30'					

	WATER OBSERVATIONS	TYPE SAMPLER
METHOD: HOLLOW STEM AUGER	INITIAL DEPTH: 4.0'	X A. SPLIT-SPOON
TECHNICIAN: AR-SN	COMPLETION DEPTH: None	B.
JOB NO. 51001 mja(#203)	DEPTH AFTER: HRS.	C. SHELBY TUBE

*In reference to assumed elevation of 100.0' for bench mark shown on boring location plan.

BOWSER MORNER

LOG OF BORING NO. 4

SOIL STUDY FOR PROPOSED TANK FARM, WEST THIRD STREET, DAYTON, OHIO

BORING LOCATION: As shown on boring location plan DATE STARTED: 9/19/89

SURFACE ELEVATION: 102.8'* DATE COMPLETED: 9/19/89

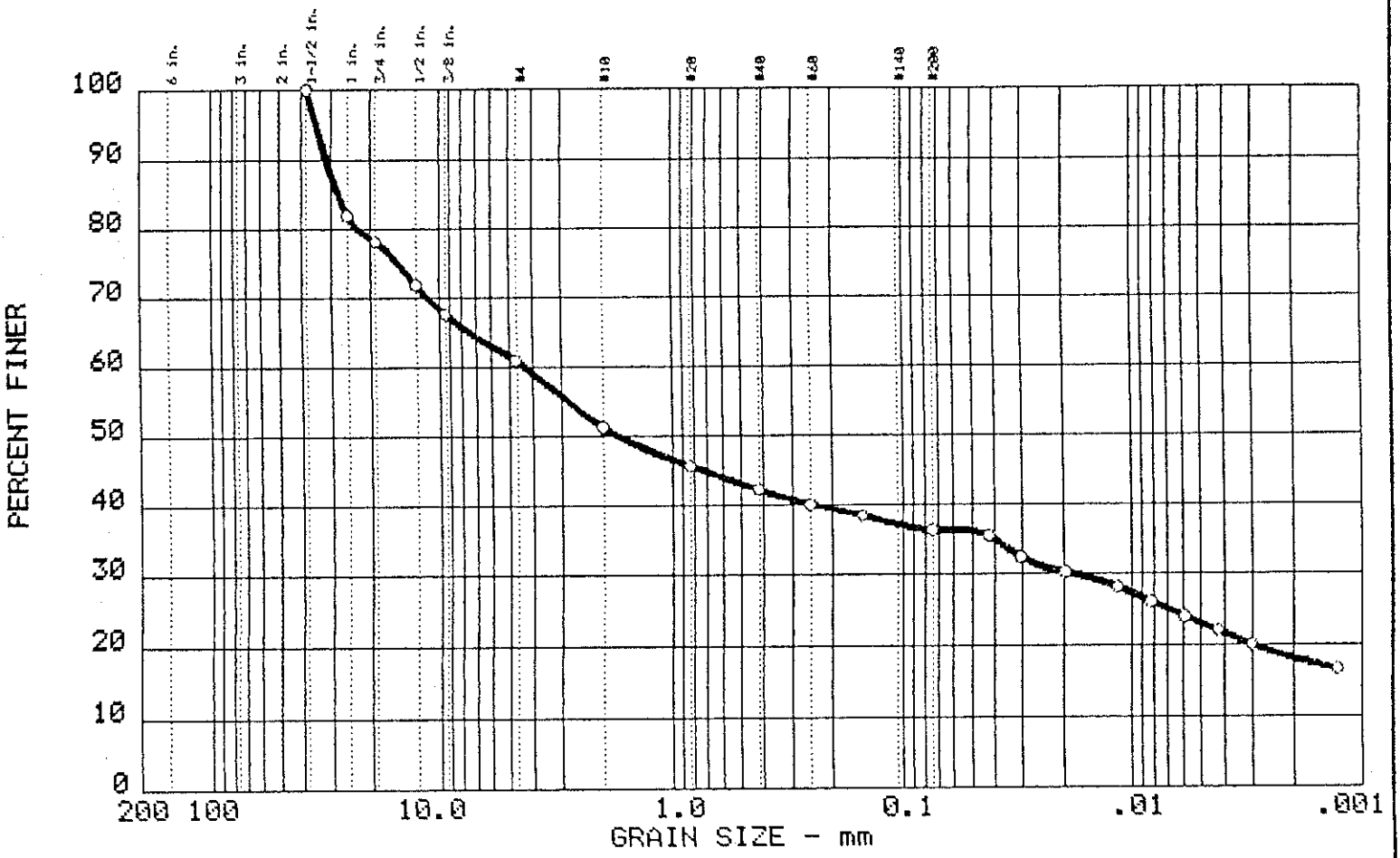
STRATUM	DESCRIPTION OF MATERIAL	SAMPLE NO. & TYPE	SAMPLE DEPTH	BLOWS PER 6"	"N" BLOWS /Ft. OR CORE REC.
0.0'	(FILL) Asphalt pavement				
0.5'					
1.2'	(FILL) Granular base				
2.0'	(FILL) Stiff greenish brown silt, some sand, some gravel, some clay - damp	1A	1.0- 2.5	5- 5- 8	13
5'					
6.0'	(ORIGINAL) Stiff brown silt, some clay, some sand, trace rock fragments - damp				
	(Becomes hard at 3.5')	2A	3.5- 4.0	100/3"	100+
10'	Apparent rock	3A	6.0- 6.5	100/5"	100+
		4A	8.5- 9.0	100/2"	100+
	Bottom of boring at 9.0'				
15'					
20'					
25'					
30'					

	WATER OBSERVATIONS	TYPE SAMPLER
METHOD: HOLLOW STEM AUGER	INITIAL DEPTH: None	X A. SPLIT-SPOON
TECHNICIAN: AR-SN	COMPLETION DEPTH: None	___ B.
JOB NO. 51001 mja(#203)	DEPTH AFTER: ___ HRS. ___	___ C. SHELBY TUBE

*In reference to assumed elevation of 100.0' for bench mark shown on boring location plan.

BOWSER MORNER

GRAIN SIZE DISTRIBUTION TEST REPORT



	Test	%+3"	% GRAVEL	% SAND	% SILT	% CLAY
o	19	0.0	39.0	24.7	13.3	23.0

	LL	PI	D_{85}	D_{60}	D_{50}	D_{30}	D_{15}	D_{10}	C_c	C_u
o	31	12	27.86	4.32	1.72	0.017				

MATERIAL DESCRIPTION	USCS	AASHTO
o BROWN GRAVEL, SOME SAND, SOME CLAY, SOME SILT	GC	A-6

Project No.: 51001
Project: GM, DELCO PRODUCTS
o Location: 3-3A, 6.0'-7.5'

Date: 09-28-89

GRAIN SIZE DISTRIBUTION TEST REPORT
BOWSER-MORNER, INC.

Remarks:
NATURAL MOISTURE: 7.3%

Fig. No. ____

GRAIN SIZE DISTRIBUTION TEST DATA — Test No.: 19

Date: 09-28-89
Project No.: 51001
Project: GM, DELCO PRODUCTS

Sample Data

Location of Sample: 3-3A, 6.0'-7.5'
Sample Description: BROWN GRAVEL, SOME SAND, SOME CLAY, SOME SILT
USCS Class: GC — Liquid limit: 31
AASHTO Class: A-6 — Plasticity index: 12

Notes

Remarks: NATURAL MOISTURE: 7.3%

Fig. No.:

Mechanical Analysis Data

Initial
Dry sample and tare= 595.80
Tare = 97.50
Dry sample weight = 498.30
Sample split on number 10 sieve
Split sample data:
Sample and tare = 50 Tare = 0 Sample weight = 50
Cumulative weight retained tare= 0
Tare for cumulative weight retained= 0

Sieve	Cumul. Wt. retained	Percent finer
1.5 inches	0.00	100.0
1 inches	89.84	82.0
0.75 inches	108.41	78.2
0.5 inches	140.18	71.9
0.375 inches	161.27	67.6
# 4	194.49	61.0
# 10	242.67	51.3
# 20	5.39	45.8
# 40	8.83	42.2
# 60	10.95	40.1
# 100	12.52	38.5
# 200	14.62	36.3

Hydrometer Analysis Data

Separation sieve is number 10
Percent -# 10 based on complete sample= 51.3
Weight of hydrometer sample: 50
Hygroscopic moisture correction:
Moist weight & tare = 49.47
Dry weight & tare = 49.21
Tare = 28.58
Hygroscopic moisture= 1.3 %
Calculated biased weight= 96.3
Automatic temperature correction

Composite correction at 20 deg C =-3.4

Meniscus correction only= 0
Specific gravity of solids= 2.65
Specific gravity correction factor= 1.000
Hydrometer type: 152H

Elapsed time, min	Temp, deg C	Actual reading	Corrected reading	K	Rm	Eff. depth	Diameter mm	Percent finer
1.0	22.4	37.0	34.1	0.0133	37.0	10.2	0.0424	35.4
2.0	22.4	34.0	31.1	0.0133	34.0	10.7	0.0307	32.3
5.0	22.4	32.0	29.1	0.0133	32.0	11.0	0.0197	30.2
15.0	22.4	30.0	27.1	0.0133	30.0	11.4	0.0115	28.2
30.0	22.5	28.0	25.1	0.0132	28.0	11.7	0.0083	26.1
60.0	22.6	26.0	23.2	0.0132	26.0	12.0	0.0059	24.1
120.0	22.8	24.0	21.2	0.0132	24.0	12.4	0.0042	22.0
240.0	23.0	22.0	19.3	0.0132	22.0	12.7	0.0030	20.0
1440.0	22.0	19.0	16.0	0.0133	19.0	13.2	0.0013	16.6

Fractional Components

% + 3 in. = 0.0 % GRAVEL = 39.0 % SAND = 24.7
% SILT = 13.3 % CLAY = 23.0

D85= 27.86 D60= 4.315 D50= 1.718
D30= 0.0174

Sample no. 1

% Water content 17.72

Blow count 26

Regression equation

NOT APPLICABLE

Coefficient of determination

NOT APPLICABLE

Liquid limit = 17.8

Flow index = NOT APPLICABLE

Input plastic limit = 14.3

Toughness index = NOT APPLICABLE

Plasticity index = 3.5

Shrinkage limit = NOT APPLICABLE

Input natural water content = 7.9

Liquidity index = NOT APPLICABLE

Boring No. = 1-3A

Depth = 6.0'-7.5' Number = 51001

09-29-1989

MOISTURE CONTENT OF SOIL

Project No.: 51001
GM, DELCO PRODUCTS

Boring No.	Sample No.	Depth (ft)	Moisture Content %
1	1A	1.0-2.5	13.7
1	2A	3.5-5.0	10.2
1	3A	6.0-7.5	7.9
1	4A	8.5-10.0	10.4
2	1A	2.5-4.0	26.9
2	2A	5.0-6.5	23.0
2	3A	7.5-9.0	12.1
2	4A	10.0-11.5	9.3
2	5A	13.5-14.0	0 recovery
3	1A	1.0-2.5	4.0
3	2A	3.5-5.0	18.8
3	3A	6.0-7.5	7.3
3	4A	8.5-10.0	6.6
4	1A	1.0-2.5	17.2
4	2A	3.5-4.0	0 recovery
4	3A	6.0-6.5	0 recovery
4	4A	8.5-9.0	0 recovery

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

DON

CERTIFIED MAIL

RE: GMC Delco Dayton
OHD 000 817 023
OHIO 05-57-0317

October 17, 1989

Mr. Tim Wojdacz, Supervisor
Environmental Engineering
GMC Delco Dayton
P.O. Box 1224
Dayton, Ohio 45401

Dear Mr. Wojdacz:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility.

As you may know, Ohio has recently been delegated authorization to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing Resource Conservation and Recovery Act (RCRA) permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendment of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately regardless of a State's authorization status, USEPA will continue to implement the applicable HSWA requirements. In other words under HSWA, there will continue to be a dual State/Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, USEPA will continue to administer and enforce those portions of HSWA in Ohio (which may include the issuance of full or partial permits) until Ohio receives authorization to do so and until that time, Ohio will continue to assist USEPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a "completeness" review of your Part B application and has determined it to be complete. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and the corresponding Federal regulations. Completeness means that all items required by regulation appear to have been addressed in your application, but does not mean that these items have been addressed substantively or in adequate detail which would allow a determination to be made as to whether the proposal complies with the Director's Hazardous Waste Facility Standards Chapters.

We will now begin our "technical adequacy" review during which we analyze the application for compliance with applicable hazardous waste management requirements of State and Federal law. We will be working in concert with the U.S. EPA throughout the course of the technical adequacy review. Please understand that either, or both, of our Agencies may request additional information from you if it is necessary to clarify, modify, or supplement previous submissions in order to substantively evaluate the permit application for technical adequacy.

If you have any questions concerning the review, or the level of detail we expect, please do not hesitate to contact Ghassan Khaled, at (614) 644-2972.

Yours truly,

Edward A. Kitchen (EAK)

E.A. Kitchen, Manager
Technical Assistance and Engineering Section
Division of Solid and Hazardous Waste Management

EAK/pas

cc: Lisa Pierard, USEPA
Joel Morbito, USEPA
Harold O'Connell, SWDO
Jeff Hines, SWDO
Ed Lim, CO, Ohio EPA
Ghassan Khaled, CO Ohio EPA
Central File

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OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

DON

Toward A Cleaner Environment
15 Year Anniversary
1972 - 1987

Richard F. Celeste
Governor

CERTIFIED MAIL

RE:GMC Inland Division
Re # OHD 000 817 023
OHIO 05-57-0317

May 16, 1989

Mr. Tim Wojdacz, Supervisor
Environmental Engineering
GMC Inland Division
P.O. Box 1224
Dayton, Ohio 45401

Dear Mr. Wojdacz:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in.

As you may know, Ohio, which has a State hazardous waste program, has not yet been delegated full authority to conduct the federal hazardous waste program. As a result, hazardous waste facilities operating in Ohio must obtain both a State and Federal RCRA permit. However, pursuant to an agreement reached with U.S. EPA, Ohio EPA is conducting initial "completeness" reviews and making "completeness" determinations on behalf of the U.S. EPA for facilities that store or treat hazardous waste in containers and tanks. In other words, until such time as the State is authorized to conduct the federal hazardous waste program, Ohio EPA will examine RCRA permit applications to ascertain whether or not the application contains all required information in order to be deemed "complete" and thereafter Ohio EPA and U.S. EPA will concurrently review the permit application for technical adequacy.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a "completeness" review of your Part B application and has determined it to be incomplete. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and the corresponding Federal regulations.

We have enclosed comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to

Ohio EPA within 30 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.

2. New language is capitalized

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau/Ghassan Khaled
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Harold O'Connell,
Ohio EPA, DSHWM, SWDO
7 East 4th Street
Dayton, Ohio 45402

Lisa Pierard,
RCRA Activities
Part B Application
U.S. EPA - Region V
Chicago, Illinois 60690-3587

Upon receipt of a satisfactory response regarding all the information requested, Ohio EPA will notify you in writing that the application is

complete. Our determination of completeness will mean that all items required by regulation appear to have been addressed in your application, but does not mean that these items have been addressed substantively or in adequate detail which would allow a determination to be made as to whether the proposal complies with the Director's Hazardous Waste Facility Standards Chapters. We may request additional information from you, if it is necessary to clarify, modify or supplement previous submissions of information in order to substantively evaluate the permit application for technical adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the application for a renewal permit, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or 4) the application for a renewal permit may be returned to you as incomplete.

If you have any questions concerning the review of the permit application, or the level of detail we expect, please do not hesitate to contact Ghassan Khaled, at (614) 644-2972.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and applicants for permits for hazardous waste treatment, storage and disposal facilities. Every applicant must file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General, at the same time that the applicant files his hazardous waste permit application with the Ohio EPA (ORC 3734.42(A)). The disclosure statement and the investigative report provided by the Attorney General will, form a basis along with the complete and technically adequate permit application for the State's determination on the permit renewal. If there are questions concerning the disclosure statement please contact Bryan Zima, of the OAG at (614) 466-2766.

Yours truly,

Edward A. Kitchen

E.A. Kitchen, Manager
Technical Assistance and Engineering Section
Division of Solid and Hazardous Waste Management

cc: Lisa Pierard, USEPA
Joel Morbito, USEPA
Ed Lim, CO, DSHWM, OEPA
Ghassan Khaled, CO, DSHWM, OEPA
Harold O;Connell, SWDO
Jeff Hines, SWDO

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GMC, INLAND DIVISION
PART B COMPLETENESS REVIEW COMMENTS
OHD 000 817 023/05-57-0317

A. Part A. Application
40 CFR 270.13; OAC 3745-50-43 OAC 3745-50-43

1. Submit a Part A application that shall include the following information:

(a) The activities conducted by the applicant which require it to obtain a permit under RCRA.
(b) Name, mailing address, and location, including latitude and longitude of the facility for which the application is submitted.
(c) Up to four SIC codes which best reflect the principal products or services provided by the facility.
(d) The operator's name, address, telephone number, ownership status, and status as Federal, State, private, public, or other entity.
(e) The name, address, and phone number of the owner of the facility.
(f) Whether the facility is located on Indian lands.
(g) An indication of whether the facility is new or existing and whether it is a first or revised application.
(h) For existing facilities, (1) a scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas; and (2) photographs of the facility clearly delineating all existing structures; existing treatment, storage, and disposal areas; and sites of future treatment, storage, and disposal areas.
(i) A description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items.
(j) A specification of the hazardous wastes listed or designated under 40 CFR Part 261 to be treated, stored, or disposed of at the facility, an estimate of the quantity of such wastes to be treated, stored, or disposed annually, and a general description of the processes to be used for such wastes.
(k) A listing of all permits or construction approvals received or applied for under any of the following programs:
    (1) Hazardous Waste Management program under RCRA.
    (2) UIC program under the SWDA.
    (3) NEPDES program under the CWA.
    (4) Prevention of Significant Deterioration (PSD) program under the Clean Air Act.
    (5) Nonattainment program under the Clean Air Act.
    (6) National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act.
    (7) Ocean dumping permits under the Marine Protection Research and Sanctuaries Act.
    (8) Dredge or fill permits under section 404 of the CWA.
    (9) Other relevant environmental permits, including State permits.

(l) A topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the source, depicting the facility and each of its intake and discharge structures; each of its hazardous waste treatment, storage, or disposal facilities; each well where fluids from the facilities; each well where fluids from the facility are injected underground; and those wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary.

(m) A brief description of the nature of the business.

B. Facility Description

2. 40 CFR 270.14(b)(1); OAC 3745-50-44(A)(1)
Provide a brief description of processes involved in the onsite generation of hazardous waste.

3. 40 CFR 270.14(b)(19); OAC 3745-50-44(A)(19)
Submit a topographic map showing a distance of 1000 feet around the facility at a scale of 1 inch equal to not more than 200 feet. The map shall clearly show the following:

(a) Map scale and date.
(b) 100-year floodplain area.
(c) Surface waters including intermittent streams.
(d) Surrounding land uses (residential, commercial, agricultural, recreational).
(e) A wind rose (i.e. prevailing windspeed and direction).
(f) Orientation of the map (north arrow).
(g) Legal boundaries of the HWM facility site.
(h) Access control (fences, gates).
(i) Injection and withdrawal wells both on-site and off-site.
(j) Buildings; treatment, storage, or disposal operations; or other structure (recreation areas, runoff control systems, access and internal roads, storm, sanitary, and process sewerage systems, loading and unloading areas, fire control facilities, etc..).
(k) Barriers for drainage or flood control.
(l) Location of operational units within the hazardous waste facility site, where hazardous waste is (or will be) treated, stored, or disposed (include equipment cleanup areas).

C. Waste Characteristics

4. 40 CFR 270.14(b)(3), 264.13(c); OAC 3745-50-44(A)(3) 3745-54-13(c)

Additional Requirements of Wastes Generated Off-site.

Describe the statistical methodology employed to assure that a representative sample of incoming wastes (e.g. number of drums to be sampled) are obtained. Such methodology should adequately address concerns regarding proper off-site waste characterization.

5. 40 CFR 270.14(b)(3), 264.17(a); OAC 3745-50-44(A)(3), 3745-54-17(A)

Additional Requirements for Ignitable, Reactive, or Incompatible Wastes.

Describe those precautions taken within the facility to prevent accidental ignition of those wastes decreed ignitable.

D. Process Information

6. 40 CFR 270.15(a), 264.175(b)(1); OAC 3745-50-44(c)(1) 3745-55-75(B)(1)

Requirement for the Base of the container storage area to Contain Free Liquids.

Provide a demonstration that the secondary containment base of the container storage area is free of cracks or gaps.

7. 40 CFR 270.16, 264.193; 3745-50-44(C)(2), 3745-55-93

Tanks Systems

In order to prevent the release of hazardous waste or hazardous constituents to the environment, secondary containment must be provided. The secondary containment must be:

(1) Designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during the use of the tank system; and
(2) Capable of detecting and collecting releases and accumulated liquids until the collected material is removed.

To meet the above requirements, the secondary containment system must be at a minimum:

(1) Constructed of or lined with materials that are compatible with the wastes(s) to be placed in the tank system and must have sufficient strength and thickness to prevent failure owing to pressure gradients (including static head and external hydrological forces), physical contact with the waste to which it is exposed, climatic conditions, and the stress of daily operation (including stresses from nearby vehicular traffic).

(2) Placed on a foundation or base capable of providing support to the secondary containment system, resistance to pressure gradients above and below the system, and capable of preventing failure due to settlement, compression, or uplift;

(3) Provided with a leak-detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours, or at the earliest practicable time if the owner or operator can demonstrate to the Regional Administrator that existing detection technologies or site conditions will not allow detection of release within 24 hours; and

(4) Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation. Spilled or leaked waste and accumulated precipitation must be removed from the secondary containment system within 24 hours, or in as timely a manner as is possible to prevent harm to human health and the environment, if the owner or operator can demonstrate to the Regional Administrator that removal of the released waste or accumulated precipitation cannot be accomplished within 24 hours.

The vault system used as secondary containment must be:

(1) Designed or operated to contain 100 percent of the capacity of the largest tank within its boundary;

(2) Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration. Such additional capacity must be sufficient to contain precipitation from a 25-year, 24-hour rainfall event:

(3) Constructed with chemical-resistant water stops in place at all joints(if any):

(4) Provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete;

(5) Provided with a means to protect against the formation of and ignition of vapors within the vault, if the waste being stored or treated:

(a) Meets the definition of ignitable waste under §262.21 or
(b) Meets the definition of reactive waste under §262.21 and may form an ignitable or explosive vapor.

(6) Provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure.

F Procedures to prevent hazards

8. 40 CFR 270.14(b)(4), 264.14(c); OAC 3745-50-44(A)(4), 3745-54-14(c)

Warning Signs.

Demonstrate that the facility maintains signs which are posted at each entrance of the active portion of the facility with the legend "Danger - Unauthorized Personnel Keep Out".

9. 40 CFR 270.14(b)(5), 264.15(b)(1); OAC 3745-50-44(A)(5), 3745-54-15(B)(1)

General Inspection Requirements

Incorporate section within the inspection checklist to assure that sufficient inventory of personnel protective clothing is maintained. Periodic examination of SCBA equipment should also be documented.

10. 40 CFR 270.14(b)(5); 364.195: OAC 3745-50-44(A)(5) 3745-55-95

Tank System Inspection

The facility must develop and follow a schedule and procedure for inspecting overfill controls.
The facility must inspect at least once each operating day data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design.

11. 40 CFR 270.14(b)(6); OAC 3745-50-44(A)(6)

Waiver or documentation of prepared ness and prevention requirements.
Submit a justification of any request for a waiver(s) of the preparedness and prevention requirements of Part 264, Subpart C, or submit a documentation of preparedness and prevention requirements of Part 264, Subpart C.

I Closure and Post Closure requirements.

12. 40 CFR 270.14(b)(13), 264.111, 264.112; OAC 3745-50-44(A)(B), 3745-55-11 and 12

Closure Plans.

Describe how the proposed closure would eliminate the need for any post-closure maintenance.
Provide a closure plan which comprises compliance with the requirements of 264.112.

13. 40 CFR 270.14(b)(15) and (16); OAC 3745-50-44(A)(15) & (16)

Financial Assurance mechanism for closure and post-closure are.

Submit a copy of the documentation required to demonstrate financial assurance under 264.143 and 264.145.

14. 40 CFR 270.14(b)(17) & (18); OAC 3745-50-44(A)(17) & (18)

Liability requirements.

Submit a copy of the insurance policy or other documentation which comprises compliance with the requirements of 264.147. Where appropriate, proof of coverage by a State Financial mechanism in compliance with 264.149 or 264.150.

J. Corrective Action for Solid Waste Management Units.

15. 40 CFR 270.14(b)(20), 264.101(a); OAC 3745-50-44(A)(20)

Identify all solid waste management units at the facility including inactive units, if known.

For each solid waste management unit, submit the following information:

-Type of each unit.
-Location of each existing or closed unit on the topographic map.
-Engineering drawings for each unit, if available.
-Dimensions and materials of construction of each unit.
-Dates when the unit was in operation.
-Description of the wastes placed in each unit.
-Quantity or volume of waste, if known.

Describe the methodology used to determine that no existing or former solid waste management units exist at the facility (e.g., review of old solid waste permits, blueprints).

Specify whether or not any releases have occurred from any of the solid waste management unit.

Information on releases must include the following types of available information concerning prior or current releases.

o Date of the release

o Type of waste of constituent released

o Quantity or volume released

Nature of the release
Spill
Overflow
Ruptured pipe or tank
Result of the unit's construction (e.g., unlined surface impoundment, leaky tank)
Other

o Groundwater monitoring and other analytical data available to describe nature and extent of releases. If other than groundwater monitoring data, please describe.

p Physical evidence of distressed vegetation or soil contamination.

o Historical evidence of releases such as tanker truck accidents.

o Any state, local, or federal enforcement action which may address releases.

o Any public citizen complaints about the facility which would indicate a release.

o Any information showing the migration of the release.

Specify corrective action and schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurance of financial responsibility for completing such corrective action.

K. Other Federal Laws.

16. 40 CFR 270.14(b)(20); OAC 3745-50-44(A)(20)

Submit information demonstrating compliance with other Federal laws as required in 40 CFR 270.3

L. Part B Certification

17. 40 CFR 270.14(a), 270.11; OAC 3745-50-44, 3745-50-42

The information included in the Part B application must be signed in accordance with requirements in 270.11 (3745-50-42). The person signing the certification must use the statement mentioned in 270.11(d) [3745-50-42(D)].

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

Date: March 20, 1989

Subject: Notification of Permit modification
General Motors Corporation
Inland Division
OHD 000817023

To: Don Heller
U.S. EPA Region V
RCRA Activities
Waste Management Div.
P.O. Box A3587
Chicago Illinois 60604

Dear Mr. Heller,

Attached please find a copy of the letters sent to notify persons on our facilities mailing list of the minor modifications to our Part B permit recently approved by the Director of the EPA as required in the Sept.28 Federal Register and your letter of March 6, 1989. I have also updated the facilities' mailing list. If you have any questions, please contact me at (513) 455-3082.

Thank you for your help.

Tim Wojdacz, Supervisor
Environmental Engineering

cc: T. Crepeau - Ohio EPA
H. O'Connell - Ohio EPA SWDO

Facility Mailing List
RCRA & SARA

Tom Crepeau
Ohio EPA
Program Planning and Management Section
Division of Solid and Haz. Waste Mgmt.
P.O. Box 1049
Columbus, Ohio 43266-0149

Harold O'Connell
Division of Solid & Haz. Waste Mgmt.
Ohio EPA
Southwest District Office
7 East Fourth Street
Dayton, Ohio 45402

Don Heller
U.S. EPA Region V
Waste Mgmt. Division
230 S. Dearborn St.
Chicago, Illinois 60604

Glenn Alexander,Fire Chief
Dayton Fire Department
300 N. Main St.
Dayton, Ohio 45402

Robert Trieber, Fire Chief
Vandalia Fire Department
333 James E. Bohanan Memorial Drive
Vandalia, Ohio 45377

James Makos, Administrator
St. Elizabeth Hospital
601 Miami Blvd. West
Dayton, Ohio 45406

Mary Trimmer
Assistant Vice President
Good Samaritan Hospital
2222 Philadelphia Dr.
Dayton, Ohio 45406

Ken LeBlanc
Information Coordinator
Montgomery-Greene County
LERC
400 Miami Valley Tower
40 West Fourth St.
Dayton, Ohio 45402

James E. Newby
Director & Chief of Police
Dayton Police Department
335 W. Third St.
Dayton, Ohio 45402

Douglas Knight
Chief of Police
Vandalia Police Department
333 James E. Bohanan
Memorial Drive
Vandalia, Ohio 45377

March 9,1989

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

Douglas Knight, Chief of Police
Vandalia Police Department
333 James E. Bohanon Memorial Drive
Vandalia, Ohio 45377

Dear Mr. Knight,

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

One of the Federal requirements is that when modifications to our permit are made and approved by the director of the EPA, the persons on our facility mailing list must be notified.

We recently submitted and received approval of a modification to our permit. The modification was a change in personnel at our facility and updated closure costs of the HWM area. These modifications are considered minor, but we are required to notify you that they were made.

Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

Robert Trieber, Fire Chief
Vandalia Fire Department
333 James E. Bohanon Memorial Drive
Vandalia, Ohio 45377

Dear Mr. Trieber,

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

One of the Federal requirements is that when modifications to our permit are made and approved by the director of the EPA, the persons on our facility mailing list must be notified.

We recently submitted and received approval of a modification to our permit. The modification was a change in personnel at our facility and updated closure costs of the HWM area. These modifications are considered minor, but we are required to notify you that they were made.

Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

Glenn Alexander, Fire Chief
Dayton Fire Department
300 N. Main Street
Dayton, Ohio 45402

Dear Mr. Alexander,

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

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Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

James E. Newby
Director and Chief of Police
335 W. Third Street
Dayton, Ohio 45402

Dear Mr. Newby

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

One of the Federal requirements is that when modifications to our permit are made and approved by the director of the EPA, the persons on our facility mailing list must be notified.

We recently submitted and received approval of a modification to our permit. The modification was a change in personnel at our facility and updated closure costs of the HWM area. These modifications are considered minor, but we are required to notify you that they were made.

Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

Kenneth A. LeBlanc, Information Coordinator
Montgomery-Greene County LERC
400 Miami Valley Tower
40 West Fourth Street
Dayton, Ohio 45402

Dear Mr. LeBlanc,

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

One of the Federal requirements is that when modifications to our permit are made and approved by the director of the EPA, the persons on our facility mailing list must be notified.

We recently submitted and received approval of a modification to our permit. The modification was a change in personnel at our facility and updated closure costs of the HWM area. These modifications are considered minor, but we are required to notify you that they were made.

Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

Mary Trimmer
Assistant Vice President, Operations
Good Samaritan Hospital
2222 Philadelphia Drive
Dayton, Ohio 45406

Dear Ms. Trimmer,

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

One of the Federal requirements is that when modifications to our permit are made and approved by the director of the EPA, the persons on our facility mailing list must be notified.

We recently submitted and received approval of a modification to our permit. The modification was a change in personnel at our facility and updated closure costs of the HWM area. These modifications are considered minor, but we are required to notify you that they were made.

Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

March 10, 1989

James Makos, Administrator
St. Elizabeth Hospital
601 Miami Blvd. West
Dayton, Ohio 45406

Dear Mr. Makos,

The Federal Resource Conservation and Recovery Act and the U.S. Environmental Protection Agency (EPA) regulations impose certain obligations on "existing hazardous waste management (HWM) facilities." State of Ohio regulations may be found in OAC 3745-65-53(A)(B). Our Plant comes within this definition, and we would appreciate receiving your cooperation in our efforts to comply with the applicable requirements.

One of the Federal requirements is that when modifications to our permit are made and approved by the director of the EPA, the persons on our facility mailing list must be notified.

We recently submitted and received approval of a modification to our permit. The modification was a change in personnel at our facility and updated closure costs of the HWM area. These modifications are considered minor, but we are required to notify you that they were made.

Should you have any questions please call me on 455-3082.

Very Sincerely

Tim Wojdacz, Supervisor
Environmental Engineering

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

Harold O'Connell
Ohio EPA
Division of Solid and Hazardous Waste Management
Southwest District Office
7 East Fourth Street
Dayton, Ohio 45402

March 6, 1989

Ref. Part B Inland Dayton
OHD000817029~~8~~ 023
Ohio permit 05-57-0317

Dear Mr. O Connell,

Per our conversation on March 1, 1989, I have clarified the third paragraph on page G-3 of our contingency plan. I have attached two copies of the page, the first one showing the highlighted change. Thank you for your input.

Sincerely,

Tim Wojdacz

Tim Wojdacz, Supervisor
Environmental Engineering

cc: D. Heller - U.S. EPA
T. Crepeau - Ohio EPA

G-4b Identification of Hazardous Wastes

The emergency coordinator will immediately identify the character, source, amount, and area extent of any release. Waste Management and Environmental Engineering personnel will provide any necessary support in such a situation.

G-4c Assessment

The coordinator will assess hazards, both direct and indirect, to human health or the environment.

G-4d Control Procedures

Potential accidents fall under three general classifications: (1) fire and/or explosions, (2) spills or material release, and (3) surface water flooding. Flooding is unlikely at Inland due to its position above the flood plain. Natural disasters and civil disturbances (such as strikes or bomb threats) are considered as to their affect on one of the first two categories. Figure g-1 summarizes the emergency plan of action (reference appendix one page 10 for emergency plan of action).

Fire and/or Explosion

The storage tank and waste containers are easily accessible to emergency equipment by roads through the plant and by a blacktop road between the Hazardous Waste Management facility and the railroad tracks. The City of Dayton maintains two fire stations within a mile of Inland/Dayton.

Inland also maintains its own fire brigade during working hours. The primary duties of this group would be to prevent the spread of fire or material release prior to the arrival of the Dayton Fire Department.

G-4b Identification of Hazardous Wastes

The emergency coordinator will immediately identify the character, source, amount, and area extent of any release. Waste Management and Environmental Engineering personnel will provide any necessary support in such a situation.

G-4c Assessment

The coordinator will assess hazards, both direct and indirect, to human health or the environment.

G-4d Control Procedures

Potential accidents fall under three general classifications: (1) fire and/or explosions, (2) spills or material release, and (3) surface water flooding. Flooding is unlikely at Inland due to its position above the flood plain. Natural disasters and civil disturbances (such as strikes or bomb threats) are considered as to their affect on one of the first two categories. Figure g-1 summarizes the emergency plan of action (reference appendix one page 10 for emergency plan of action).

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The storage tank and waste containers are easily accessible to emergency equipment by roads through the plant and by a blacktop road between the Hazardous Waste Management facility and the railroad tracks. The City of Dayton maintains two fire stations within a mile of Inland/Dayton.

Inland also maintains its own fire brigade during working hours. The primary duties of this group would be to prevent the spread of fire or material release prior to the arrival of the Dayton Fire Department.

6 MAR 1989

Tim Wojdacz
Environmental Engineer
General Motors Corporation
Inland Division
Post Office Box 1224
Dayton, Ohio 45401

RE: Permit Modification
General Motors Corporation
Inland Division
OHD 000 817 023

Dear Mr. Wojdacz:

On January 26, 1989, the United States Environmental Protection Agency (U.S. EPA) received revisions to your Resource Conservation and Recovery Act permit. These revisions are changes in personnel who are named in the permit, and the closure cost estimate has been updated.

These changes are Class 1 modifications under 40 CFR Part 270.42, as explained in the September 28, 1988, Federal Register. This regulation requires you to send notification of the modifications to all persons on the facility mailing list, within 90 days of the Director's approval so these persons may have an opportunity to comment on the modifications. Please notify the U.S. EPA and the Ohio Environmental Protection Agency (OEPA), in writing, when you have sent the notice of the modification to the parties involved.

These modifications are hereby approved. Enclosed please find copies of the revised pages for your permit.

Please contact Don Heller of my staff, at (312) 353-1248, if you require further assistance.

Sincerely,
ORIGINAL SIGNED BY
DAVID A. ULLRICH

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Tom Crepeau, OEPA-CO
Don Marshall, OEPA-SWDO

5HR-13:HELLER:pb:02/23/89 Disk no. 4

RCRA PERMITS	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R.	WI/MN
INIT. DATE	2-27-89 PB	DAH 2-27-89					2-28-89	3/1/89	DAH 3/1/89	DAH 3/2/89

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

January 19,1989

Mr. Don Heller
U.S. EPA - Region V
Waste Management Divison
230 South Dearborn Street
Chicago, Illinois 60604

Re: U.S. EPA ID No.
OHD000817023
Ohio Permit No.
05-57-0317

Dear Mr. Heller,

Attached please find a copy of our updated Part B permit. Revisions have been made due to personnel changes occuring since you received your last copy. No significant changes have occured at the facility. I am also sending this package to Mr. Tom Crepeau at Ohio EPA and Mr. Dick Robertson Ohio EPA Southwest District Office.

Should you have any questions, please contact me at (513) 455-3082 or Brent Lange at 455-3081.

Sincerely,

Tim Wojdacz

Tim Wojdacz, Supervisor
Environmental Engineering

COPY 2

5H-12

9 NOV 1988

Mr. Tim Wojdacz
Senior Plant Engineer
General Motors Corporation, Inland Division
Post Office Box 1224
Dayton, Ohio 45041

RE: Permit Modification
General Motors Corporation,
Inland Division
OHD 000 817 023

Dear Mr. Wojdacz:

This is to acknowledge the receipt of your revised contingency plan and your letter dated November 13, 1987, requesting a modification to your United States Environmental Protection Agency (U.S. EPA) Resource Conservation and Recovery Act permit. The modification requested involved changing the names of personnel who would address emergency situations at your facility. These changes are considered minor modifications under 40 CFR 270.42 and are hereby approved. These changes, by way of your letter, have been placed in your permit and require no further action by the U.S. EPA.

Please contact Don Heller of my staff, at (312) 353-1248, if you require further assistance.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Tom Crepeau, OEPA
Don Marshall, OEPA-SWDO
Permit Docket File

5HR-13:HELLER:pb:10/24/88

Disk No. 3

5H-12

3 NOV 1988

Tim Wojdacz, Senior Plant Engineer
General Motors Corporation, Inland Division
Post Office Box 1224
Dayton, Ohio 45041

RE: Permit Modification
General Motors Corporation,
Inland Division
OHD 000 817 023

Dear Mr. Wojdacz:

This is to acknowledge the receipt of your revised contingency plan and your letter dated November 13, 1987, requesting a modification to your United States Environmental Protection Agency (U.S. EPA) Resource Conservation and Recovery Act permit. The modification requested involved changing the names of personnel who would address emergency situations at your facility. These changes are considered minor modifications under 40 CFR §270.42 and are hereby approved. These changes, by way of your letter, have been placed in your permit and require no further action by the U.S. EPA.

Please contact Don Heller of my staff, at (312) 353-1248, if you require further assistance.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Tom Crepeau, OEPA
Don Marshall, OEPA-SWDO

FMD 10-31-88

RCRA PERMITS	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O. R. A.D.D.	WMD DIR
INIT. DATE	10-25-88 PB	DAH 10-26-88					10-31-88	10/31/88	11/1/88	11/2/88

EP 11-01-88

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

OHD 000 817 023

Date: Nov. 13, 1987

Subject: Revised Contingency Plan

To: U.S. EPA Region V
RCRA Activities
Waste Management Div.
P.O. Box A3587
Chicago Illinois 60680

Enclosed please find a copy of our revised contingenyc plan. Please include these plans with our RCRA part B application and discard the old copy in your file. Revision was necessary due to personnel changes which have occured since you received your last copy. Should you have questions please contact Howard Jordan on (513) 455-3080.

Thank you for your help.

Tim Wojdacz

Tim Wojdacz

Senior Plant Engineer
Environmental Engineering

cc: T. Staiger, Ohio EPA

COPY 2

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW

23 SEP 1983

RE: General Motors Corp., Inland Division
Dayton, Ohio
U.S. EPA ID No.: OHD 000-817-023

Dear Commenter:

Thank you for your interest in the draft Federal permit for the above-referenced facility, as proposed by this office in a "Notice of Intent to Issue" dated July 28, 1983. After carefully evaluating the facility's permit application, the United States Environmental Protection Agency (U.S. EPA) has determined that the facility has met the permitting standards specified in 40 CFR Part 264, pertaining to storage of hazardous waste in containers. A copy of our Responsiveness Summary, as required by 40 CFR 124.17, is enclosed for your review.

This letter serves to inform you that a final permit decision has been made to issue a Resource Conservation and Recovery Act (RCRA) permit to General Motors, and to subject General Motors to the conditions set forth in the permit. The permit is effective on the date of issuance and shall remain in effect for ten years, unless a review or evidentiary hearing is requested under the provisions of 40 CFR 124.19 (enclosed).

On behalf of U.S. EPA, I want to thank you again for taking an interest in the RCRA permit for General Motors Corp.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Charles J. Wilhelm, OEPA
Peggy Vince, HWFAB

23 SEP 1983

RE: General Motors Corp., Inland Division
Dayton, Ohio
U.S. EPA ID No.: OHD 000-817-023

Dear Commenter:

Thank you for your interest in the draft Federal permit for the above-referenced facility, as proposed by this office in a "Notice of Intent to Issue" dated July 28, 1983. After carefully evaluating the facility's permit application, the United States Environmental Protection Agency (U.S. EPA) has determined that the facility has met the permitting standards specified in 40 CFR Part 264, pertaining to storage of hazardous waste in containers. A copy of our Responsiveness Summary, as required by 40 CFR 124.17, is enclosed for your review.

This letter serves to inform you that a final permit decision has been made to issue a Resource Conservation and Recovery Act (RCRA) permit to General Motors, and to subject General Motors to the conditions set forth in the permit. The permit is effective on the date of issuance and shall remain in effect for ten years, unless a review or evidentiary hearing is requested under the provisions of 40 CFR 124.19 (enclosed).

On behalf of U.S. EPA, I want to thank you again for taking an interest in the RCRA permit for General Motors Corp.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Charles J. Wilhelm, OEPA
Peggy Vince, HWFAB

5HW-13:Chuck Slaustas:pg:9-19-83

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	pg	CBJ		DJ13			KJK	
DATE	9/19/83	9/20/83		9/20/83		9/21/83	9/22/83	9/23

DMR 9/21 DJT 9/22

EPA ID No.: OHD 000 817 023
Date: September 21, 1983

RESPONSE TO COMMENTS REGARDING THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT TO BE ISSUED TO GENERAL MOTORS CORPORATION, INLAND DIVISION, DAYTON, OHIO

INTRODUCTION

This response is issued pursuant to 40 Code of Federal Regulations (CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in this response be included in the administrative record.

The public comment period commenced July 28, 1983, with public notices in both the Dayton Journal Herald and the Dayton Daily News. The notices requested public comments on the draft RCRA permit for General Motors Corporation. In anticipation of a possible request for a public hearing, on July 28, 1983, U.S. EPA also gave notice that a public hearing would be held on August 30, 1983, in the Commission Chamber of the Municipal Building, Dayton, Ohio.

No public comments were presented at the hearing, nor were any written comments received through September 14, 1983, which was the end of the comment period.

DETERMINATION

The United States Environmental Protection Agency (U.S. EPA) has determined that several permit conditions should be expanded and/or clarified, in order to make the permit more specific. The following table lists the permit conditions that have been changed, and the changes which have been made.

Permit Condition	Change
I.D.11	The circumstances under which certification of construction or modification must be submitted, have been clarified.
II.D	This condition has been revised to include compliance with the security provisions of 40 CFR 264.14(c).
II.E	The inspection plan has been revised to include inspection of the storage area roof.
II.F	The qualifications of the training director have been expanded in the personnel training plan.

II.J	The content of the contingency plan has been revised to provide more detailed descriptions of decontamination procedures and of criteria which would be used to determine when to implement the plan.
II.M.2	The closure plan has been revised to reflect a higher cost estimate for closure.
III.D.	Attachment VII, Description of Wastes, has been revised to provide more detailed descriptions for sampling drums and for inspection of wastes received from off-site generators.
III and IV	The erroneous references to Attachment VII have been deleted.

C. Slaustas

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

July 26, 1983

TO: Randy Marshall, Engineering Section, Division of Hazardous Materials Management, Ohio EPA

Donald Marshall, Hazardous Materials Management Section, Southwest District Office, Ohio EPA

Charles Slaustas, U.S. EPA, Region V

RE: RCRA Part B Draft Submittal - Inland - EPA I.D. OHD000817023

Dear Sir:

Enclosed please find the latest revisions to Inland's RCRA Part B application. Major additions include several pages to the appendix of Section C (detailing sampling methods and decontamination of the sampling equipment) and a complete overhaul of the Contingency Plan, Appendix 1, Section G. Both appendices are reproduced here in their entirety for clarity. The other adequacy comments are addressed by revisions in the specific pages included. Other pages that have had to be revised because of references to new or changed pages are likewise included. Information on the financial test demonstration is handled by General Motors Central Office and is sent under separate cover to EPA Region V.

We sincerely apologize for the delays in completing these revisions, and are grateful for your patience. If any further clarification is needed, please don't hesitate to contact us at (513) 267-3080.

Very sincerely,

Howard P. Jordan, Supervisor
Environmental Engineering

al

Enclosures

OhioEPA

Re: GMC Inland
OHD000817023

April 25, 1983

Howard P. Jordan, Supervisor
Environmental Engineering
Inland, Division of General Motors Corp.
P.O. Box 1224
Dayton, OH 45401

Dear Mr. Jordan:

The Division of Hazardous Materials Management has conducted a technical review of your Part B application for a hazardous waste permit. Your application was reviewed for compliance with applicable 40 CFR, Part 264 standards. The attached list of Adequacy Comments contains items which were judged to be inadequate or needing more detail.

Please respond to these comments within 30 days. Your response should be sent to this office, our Southwest District Office and Region V. If you have any questions, please call Randy Marshall (614/462-8419) or Don Marshall (513/461-4670).

Thank you for your time and cooperation.

Yours truly,

Paul Flanigan

Paul Flanigan, Mgr.
Engineering Section
Div. of Hazardous Materials Management

PF/rm/kjl

cc: Randy Marshall, ES, DHMM
Don Marshall, DHMM-SWDO
Chuck Slaustas, Region V
Ken Westlake, Region V
Debbie Tegtmeyer, TA&WMS, DHMM
Tom Crepeau/file, P&MRS, DHMM
Tom Carlisle, TA&WMS, DHMM

RECEIVED
APR 29 1983
WASTE MANAGEMENT BRANCH

GMC INLAND

ADEQUACY COMMENTS

C. Waste Characteristics

1. Provide a more detailed description of your method for sampling drums, both liquid and solid, and for sampling your storage tank. This should also include the type of sampling equipment to be used and the procedure for decontaminating the equipment.

2. Describe the procedures which will be used to inspect the hazardous waste received from off-site to ensure that it matches the identity of the waste designated on the manifest.

3. Include the precautions taken to prevent the accidental ignition or reaction of ignitable or reactive waste.

D. Process Information

1. Provide more information on the sizes and types of containers used to store hazardous waste.

2. Provide clarification on the source of stormwater figures. Why are the calculations based on 3 inches of rain falling 50° from the vertical? If this is supposed to represent the worst case, justify the assumption. During what period of time does this three inches of rain fall? Why is only the north end considered in the calculations?

3. Provide more detail on the management of collected stormwater especially regarding:

   a. Sampling technique, analysis methods, and parameters to be considered in determining if the stormwater is a hazardous waste.

   b. What disposal options will be considered if the stormwater is found to be contaminated?

4. Provide documentation that containers of ignitable waste are stored at least 50 ft. from the property line.

F. Procedures to Prevent Hazards

1. The legend on the warning sign posted at the gate entrance to the storage area must also indicate that entry into the storage area can be dangerous.

2. Warning signs must also be placed at the entrance to the storage area from building 16, and at other locations in sufficient number to be seen from any approach to the storage area.

3. The roof of the storage area must be added to the inspection plan and inspection log.

G. Contingency Plan

1. The alternate emergency coordinators have not been clearly identified and must be listed in the order in which they will assume responsibility as alternates.

2. Provide a site plan showing the major structural features of the facility including topography and adjacent land features and uses.

3. Describe the criteria which will be used to determine when to implement the plan.

4. Include the quantity and types of wastes expected to be in storage at any time in the facility description.

5. Identify the primary and/or secondary hazards associated with the various types of wastes handled at your facility.

6. Include in your list of emergency equipment the name, location, and capabilities of all personal safety equipment, and any additional equipment, not already listed, which may be utilized in an emergency such as pumps, drums, booms, and decontamination equipment.

7. Provide a more detailed description of the actions to be taken to clean up and dispose of any recovered material from a spill, fire or explosion.

8. Provide a detailed description of the procedures for the decontamination and renovation of all emergency equipment, contaminated process equipment, and personal protective equipment.

H. Personnel Training

The qualifications of the Training Director need to be described more thoroughly. The specific seminars to be attended need to be listed and described. Any educational qualifications for the Training Director need to be described in more detail.

I. Closure Plan

1. Provide an estimate of the expected year of closure, which may be set as the expiration date of the permit if no other date is practical.

2. The maximum amount of waste in your storage tanks at any given time should correspond to the maximum capacity noted in your Part A application.

3. Provide a more detailed description of closure activities for the following:

   a. Removal and disposal of drummed waste.
   b. Removal and disposal of tank waste.
   c. Decontamination of trench around storage area and disposal of residue.
   d. Removal and disposal of the residue from the decontamination of the storage pad.

4. The closure cost estimate must also include the following:

   a. Labor cost for closure if not included.
   b. Decontamination cost of tanks.
   c. Disposal cost for decontamination material, both liquid and solid.
   d. Chemical analysis cost.

5. GMC uses the financial test to demonstrate coverage for both closure and liability insurance. The changes and additions made to the closure plan will affect the closure cost estimate (see above notes). Please adjust the cost estimate accordingly. In addition, the financial test documentation must include:

   a. "ATTACHMENT A" summarizing the facilities covered by the financial test.
   b. A summary of closure and/or post-closure costs for all GMC facilities covered by the financial test.
   c. A copy of the most recent annual financial report, in addition to a special report from an independent auditor confirming the data submitted. The independent auditor's report was included, but the annual financial report was not.

   These items should be included with the updated financial test demonstration due from GMC on May 15, 1983.

MAR 18 1983

5HW-13

Tom Crepeau, Chief
Permits and Manifest Records Section
Division of Hazardous Materials Management
Ohio Environmental Protection Agency
361 East Broad Street, P.O. Box 1049
Columbus, Ohio 43216

RE: Part B Application for
Inland Division, General Motors Corp.
Dayton, Ohio
EPA ID #: OHD 000-817-023

Dear Mr. Crepeau:

We have determined that the RCRA Part B permit application for the above-referenced facility is complete. We are enclosing a copy of our letter to the facility advising them of this determination.

We ask that you perform a detailed technical evaluation of the application materials to ensure conformance with all applicable 40 CFR Part 264 standards. Please submit a "preliminary staff determination" (PSD) to us by May 31, 1983. The PSD should contain (a) a draft permit, (b) a "notice of intent to deny", or (c) a determination, with justification, that an additional specified period of time is necessary to complete the evaluation. The PSD should also include a fact sheet, or statement of basis, as appropriate.

Please contact Mr. Charles B. Slaustas, the responsible person on my staff, at (312) 353-2474, if you have any questions.

Sincerely yours,

William H. Miner, Chief
Technical, Permits and Compliance Section
Waste Management Branch

Enclosure

bcc: Kathy Homer, Ohio SIO
Ken Westlake, Ohio SS

5HW-13:Chuck Slaustas:pg:3-17-83

042-12

m.p. folder

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	pg 3/19/83	CBS 3/17/83		DJB 3/17/83		3/18/83		

OhioEPA

Re: GMC Inland Division
OHD000817023

February 16, 1983

Kathy Homer, State Implementation Officer
U.S. EPA, Region V
Waste Management Branch-5HW13
230 South Dearborn Street
Chicago, IL 60604

Dear Kathy:

The Division of Hazardous Materials Management has conducted an administrative review of the additional information submitted by GMC Inland Division, Dayton Plant, in response to our initial completeness review. This Part B application was reviewed for completeness pursuant to regulations published in 40 CFR 122.25, 124.3 and Part 264.

The addition of this recently submitted information has been judged to have completed the application in accordance with all applicable regulations. This determination was made by Central Office and District Office personnel. The DHMM will begin the adequacy review of this application.

If you have any questions about our review, please feel free to contact Randy Marshall at (614) 462-8419.

Sincerely,

Paul Flanigan

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/rm/kjl

cc: Chuck Wilhelm, Chief, DHMM
Dave Strayer/Don Marshall, SWDO
Tom Crepeau/file, P&MRS, DHMM
Randy Marshall, ES, DHMM
Tom Carlisle, TA&WMS, DHMM
Ken Westlake, U.S. EPA, Region V
Karen Heyob, ES, DHMM

042-10

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

January 13, 1983

Mr. William H. Miner, Chief
Technical, Permits and Compliance
RCRA Activities
U.S. EPA, Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

Dear Mr. Miner:

Subject: Part "B" Application, OHD000817023

Enclosed you will find three sets of revisions to our Part "B" application of 9/30/82. We trust the additional information will satisfy the requirements as set forth in your letter of December 2, 1982. The attachment to your letter is also reproduced here for your convenience. The revisions are summarized as follows:

Item 1, traffic information is expanded on pages B-14 and 15 and new page B-16.

Item 2, off-site waste inspection procedures are expanded on the final page of Section C, designated C2-IV.

Item 3, tank #1 design specifications have been added to page D-9 and the construction drawing added as page D-15.

Item 4, warning signs information is added to page F-6.

Items 5 & 6, contingency plan has been generally revised to include the information requested and to add the name of the emergency coordinator of our Vandalia plant. It is included here in its entirety and should replace Appendix G-I.

Item 7, training program, job titles and duties have been expanded by the addition of pages H-1a through H-1p to cover Maintenance and Plant Security job descriptions. The Waste Management "General Foreman" is the Waste Management General Supervisor previously described (the two terms are used interchangeably). The names of the approximately 850 individuals covered by these descriptions are maintained by our Personnel Department on-site.

While we believe the revisions will be adequate to complete the application, if you have any questions or need any further clarifications, please contact us on (513) 267-3080.

Very sincerely,

Howard P. Jordan

Howard P. Jordan, Supervisor
Environmental Engineering

al

Enclosures

cc: Paul Flanigan, OEPA

Attachment to letter dated
from William H. Miner to Howard Jordan concerning Part "B" Application
OHD000817023

Review of the application indicated that the following requirements remain to be satisfied.

1. The description of traffic information should be expanded to include both the weight of incoming and outgoing trucks transporting hazardous wastes, and traffic pattern of wastes received from off-site locations.

2. The description of the procedure that will be used to inspect and sample wastes generated off-site should be expanded to include both the procedure and the sampling methods used to determine their identity.

3. Although the dimensions and construction material were provided for Tank #1, design specifications must still be provided.

4. The description of warning signs should be expanded to include information concerning whether the legend on sign is legible from a distance of at least 25 feet.

5. The contingency plan should be expanded to include a general description of the facility.

6. The evacuation plan should be revised to include a map which clearly shows evacuation routes.

7. The decription of the introductory and continuing training programs should be expanded to include additional job titles, duties, and names of employees receiving training. Although information was provided concerning the Environmental Engineering Supervisor, Waste Management Department General Supervisor, and Operators, it appears that information is needed concerning position such as General Foreman of the Waste Management Department, maintenance personnel, and plant security.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-TUB

DEC 0 2 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Howard Jordan
Supervisor, Environmental Controls
GMC, Inland Division
P.O. Box 1224
Dayton, Ohio 45401

RE: Part "B" Application
OHD000817023

Dear Mr. Jordan:

Thank you for the hazardous waste permit application for your facility in Dayton, Ohio. The application has been reviewed for completeness (but not technical adequacy) pursuant to the regulation published in 40 CFR 124.3 and 122.25. Our review comments are shown on the attachment. These comments have been coordinated with the Ohio Environmental Protection Agency (OEPA), which conducted a joint review of the permit application with us.

Please send the requested information to this office, with a copy to the Ohio EPA within 30 days of receipt of this letter.

Thus, several information requirements remain to be satisfied before your application is considered complete. When this information is received by this office, we will begin a technical review of your application. Additional information concerning technical aspects of the application may be requested from your organization during the technical review.

I have assigned Mr. Charles Slaustas of my staff on the principal contact for review of your application. Please do not hesitate to call him at (312) 353-2474, if you have any questions or desire further clarification concerning completions of your application.

Sincerely,

Daniel J. Banaszek, for
William H. Miner, Chief
Technical, Permits and Compliance

Enclosure

cc: Leonard P. Roberts
GMC, Inland Div

Paul Flanigan, OEPA

bcc: Permit file
Kathy Hamer
Randy Marshall

Attachment to letter dated
from William H. Miner to Howard Jordan concerning Part "B" Application
OHD000817023

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1. The description of traffic information should be expanded to include both the weight of incoming and outgoing trucks transporting hazardous wastes, and traffic pattern of wastes received from off-site locations.

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4. The description of warning signs should be expanded to include information concerning whether the legend on sign is legible from a distance of at least 25 feet.

5. The contingency plan should be expanded to include a general description of the facility.

6. The evacuation plan should be revised to include a map which clearly shows evacuation routes.

7. The decription of the introductory and continuing training programs should be expanded to include additional job titles, duties, and names of employees receiving training. Although information was provided concerning the Environmental Engineering Supervisor, Waste Management Department General Supervisor, and Operators, it appears that information is needed concerning position such as General Foreman of the Waste Management Department, maintenance personnel, and plant security.

PART B MATERIAL

OhioEPA

November 12, 1982

Kathy Homer, State Implementation Officer
U.S. EPA, Region V
Waste Management Branch
230 South Dearborn St.
Chicago, IL 60604

Dear Kathy:

The Division of Hazardous Materials Management has conducted an administrative review of the Part B application submitted by GMC Inland Division, Dayton Plant. This application was reviewed for completeness pursuant to regulations published in 40 CFR 122.25, 124.3, and Part 264.

As indicated in the attached completeness checklist, several required items were not included. A brief discussion of the deficiencies is found on the attached comment page.

If you have any questions about our review, please feel free to call Randy Marshall at (614) 462-8419.

Sincerely,

Paul Flanigan

Paul Flanigan, Manager
Engineering Section
Div. of Hazardous Materials Management

PF/rm/kjl

Attachment

cc: Chuck Wilhelm, Chief, DHMM
Dave Strayer/Don Marshall, SWDO
Tom Crepeau/file, P&MRS, DHMM
Randy Marshall, ES, DHMM
Tom Carlisle, TA&WMS, DHMM
Jody Traub, U.S. EPA, Region V
Karen Heyob, ES, DHMM

State of Ohio Environmental Protection Agency
361 E. Broad St. Columbus, Ohio 43216-1049 (614) 466-8565

James A. Rhodes, Governor
Wayne S. Nichols, Director

Permit Application Checklist

Following is the permit application checklist u
omissions in a Part B application. Only items for w
are provided should be checked.

Facility name GMC INLAND
Facility address 2701 HOME AVENUE
P.O. BOX 1224
DAYTON, OHIO 45401
Type of facility Generator/Storage (S01, S02)
Facility contact Howard Jordan
Date of application submission 9/30/82

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
C-2b	Description of the test methods used	X			pg. 4-5 of W.A.P.
C-2c	Description of the sampling methods used	X			pg. 2-3 of W.A.P.
C-2d	Description of frequency of analyses	X			pg. 3 of W.A.P.
C-2e	Description of inspection of off-site generated wastes		X		
D.	PROCESS INFORMATION				
D-1	Containers				
D-1a	Containers with free liquids				
D-1a(1)	Primary containment devices: a description of basic design parameters, dimensions, construction materials, and demonstration of compatibility of waste with containers	X			D-1 thru D-7
D-1a(2)	Description of container management practices (opening, handling, and storage procedures) to insure container integrity	X			D-5
D-1a(3)	Design and operation specifications for secondary containment system including a drawing of all the design aspects of the containment system and:				
D-1a(3)(a)	Demonstration of structural integrity of base underlying containers, and ability of bases to contain spills, leaks, and accumulated precipitation	X			D-1, D-2, D-5, D-7
D-1a(3)(b)	Description of how containment system design promotes drainage or how containers are kept from contact with free standing liquids	X			D-7
D-1a(3)(c)	Description of containment system capacity relative to the number and volume of containers to be stored	X			D-7
D-1a(3)(d)	Description of containment system provisions for preventing or managing run-on	X			D-1, D-2, D-7
D-1a(4)	Description of containment system means of analyzing and removing accumulated liquids to prevent overflow	X			D-6, D-7
D-1b	Containers without free liquid				
D-1b(1)	Documentation/information showing that the wastes do not contain free liquids			X	D-7
D-1b(2)	Primary containment devices: a description of basic design parameters, dimensions, construction materials, and demonstration of compatibility of waste with containers			X	D-7

PERMIT APPLICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
F-5b	Demonstration of the general precautions for handling ignitable or reactive wastes or mixing incompatible wastes	X			F-18, F-19
F-5c	For containers, a detailed description of the facility operating procedures which demonstrate compliance with ignitable or reactive waste requirements and compliance with buffer zone/location/container separation requirements for ignitable or reactive waste	X			F-19
F-5d	If incompatible wastes are stored, a description of the procedures used to insure compliance with the regulations for incompatible waste/material storage in the same container(s)	X			F-19
F-5e	For tanks, a description of operational procedures for handling and storage of ignitable or reactive wastes, including the use of buffer zones	X			D-13, D-14, F-19
F-5f	If incompatible wastes are stored, a description of the procedures used to insure compliance with the regulations for incompatible waste/material storage in the same tank(s)	X			F-19
F-5g	For waste piles, a detailed description of the facility operating procedures which demonstrate compliance with ignitable or reactive waste requirements			X	
F-5h	Description of efforts to separate hazardous waste that is incompatible with any waste or material stored nearby, including the design specifications of any dike, berm, wall, or other device used to separate the materials			X	
G.	CONTINGENCY PLAN				
	A copy of the contingency plan or amended SPCC plan	X			
G-1	A general description of the facility		X		
G-2	A list of emergency coordinator's names and phone numbers	X			G-1, pg. 4 of Appendix G-3
G-3	A list of criteria for implementation of the plan	X			G-2
G-4	A description of emergency response procedures for spills, fires, and explosions	X			G-3 - G-5, G-7 - G-9 Appendices A-1, A-2
G-5	A description of emergency equipment including location and capabilities	X			Appendix G-1
G-6	A description of coordination agreements with police and fire departments, hospitals, contractors and state and local emergency response teams	X			G-8, G-9, G-11, G-12 E.P. # in Appendix G-1

PERMIT ICATION CHECKLIST (continued)

		Provided	Not provided	Not applicable	Comments
I-1d	A description of how closure minimizes the need for post-closure maintenance and minimizes the release of wastes			X	
I-1e	An estimate of the schedule for final closure, including the expected year of closure and the total time required for closure activities	X			pg. 2-3 of closure plan
I-1f	A description of procedures for the disposal or decontamination of equipment	X			pg. 2-3 of closure plan
I-1g	For storage containers, a demonstration of how at closure all hazardous waste and hazardous waste residues will be removed from the containment system, and how remaining contaminated containers, liners, bases, and soil will be decontaminated or removed	X			pg. 2-3 of closure plan
I-1h	For storage tanks, a demonstration of how at closure all hazardous waste and hazardous waste residues will be removed from tanks and associated ancillary equipment and how the area will be decontaminated	X			pg. 2-3 of closure plan
I-1i	For waste piles, a demonstration of how at closure all hazardous waste and hazardous waste residues will be removed from the pile and from containment system components, and how the containment system and associated components will be decontaminated or removed			X	
I-2	Post-closure (reserved)				
I-3	Notice in deed and notice to land authority (reserved)				
I-4	A copy of the closure cost estimate	X			pg. 3 of closure plan
I-5	A copy of the financial assurance mechanism, either:				
	° A closure trust fund			X	
	° A surety bond			X	financial
	° A letter of credit			X	test
I-6	A copy of the post-closure estimate (reserved)				pg. 5-7 of closure plan
I-7	Financial assurance mechanism for post-closure (reserved)				

GMC INLAND

PERMIT APPLICATION COMMENTS

B-4;	Weight of hazardous waste trucks missing.
	Does not describe route for wastes received from off site (B-1) (C-2) (route from nearest major highway).
C-2e;	No waste analysis for off site generated wastes. (B-1) (C-2)
D-1a(1);	Compatibility of wastes with containers can be assumed from the information provided but is not specifically addressed.
D-2a;	Overflow tank for storage area not included - 2000 gallon holding tank B-9.
D-2a;	Standard design code not included for Tank #1 - pg. D-9, table I-1.
D-2a;	Even though it appears from figure D-5 that the tanks are covered, they don't specifically state whether the tanks are covered and how Sections 264.192 and 264.198 are affected.
F-1a(3);	Does not specify if legible from 25 feet.
G-7;	Map does not clearly show evacuation routes.
H-1a;	Only two supervisors have all of the required information on job title, name and description.

OCT 22 1982

5HW-TUB

Mr. Paul Flanigan
DHMM - OEPA
361 East Broad Street
P.O. Box 1049
Columbus, Ohio 43216

RE: Hazardous Waste Part B Permit Application

Facility EPA ID #: OHD000817023
Facility Name: GMC Inland Div. Dayton Plant
Facility Address: Dayton

Dear Mr. Flanigan:

Enclosed is a copy of the Part B application and correspondence for the above referenced facility.

Your agency is requested to perform a completeness check of the application, prepare comments, and draft a deficiency letter if appropriate. Please forward the filled-in checklist, review comments, and draft letter to this office by November 15, 1982. This will allow my staff 2 weeks to review the comments and issue the letter before expiration of the allotted 60 days review period.

Please contact Mr. Charles B. Slaustas, the responsible U.S. EPA person at (312) 353-2474, if you have any questions regarding the application.

Sincerely yours,

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosure

bcc: Jodi Traub

Inland, Division of General Motors Corporation, P.O. Box 1224, Dayton, Ohio 45401

September 28, 1982

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
RCRA Activities
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
230 South Dearborn Street
Chicago, Illinois 60690-3587

Dear Mr. Klepitsch:

SUBJECT: OH D000817023
5HW-TUB

We have enclosed three copies of the Part B RCRA application, submitted for your consideration as required by 40 CFR 122.22 and your letter of March 31, 1982. One copy has been forwarded to Ohio EPA for their consideration.

This application includes a revised Part A submittal and all pertinent descriptions of the waste storage facility at Inland. If there are any questions or clarifications needed, please contact the writer at (513) 267-3080.

Very sincerely,

Howard P. Jordan

Howard P. Jordan, Supervisor
Environmental Engineering

al

Enclosures

cc: Thomas E. Crepeau (Division of Hazardous Materials Management)

Inland DIVISION OF GENERAL MOTORS, P.O. BOX 1224, DAYTON, OHIO 45401

SUNDRY SHIPPER
ACCOUNTS PAYABLE DEBIT

SHIP TO U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60690-3527

NO. G 99541

DATE 9/29/82

AUTHORIZED BY W. E. Adams

RECEIVED BY

PATROLMAN

DEBIT

REJECTION NO.
OUR P.O. NO.
OUR R.S. NO. OR RELEASE NO.

QUANTITY SHIPPED Requested	QUANTITY SHIPPED Actual	PART NUMBER	DESCRIPTION	UNIT PRICE	AMOUNT
	1		Boxes of books containing Part B Permit Applications Not to be returned to Inland		

TOTAL

D. Cordts/al

CHARGES-IN

DATE SHIPPED	VIA	B. L. NO.	WEIGHT	CHARGES-OUT
9-29-82	Federal Express		13 #	

REMARKS:-

ACCOUNT NO.	AMOUNT
DR.	
CR.	
CR.	
CR.	

Ictw

APPROVED

F-187 REV. 9 (02590170)

PACKING SLIP

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

MAY 20 1982

REPLY TO ATTENTION OF:
5HW-TUB

Mr. Howard Jordan
Gen. Motors Corp.
P.O. Box 1224
Dayton, Ohio 45417

RE: EPA ID# OHD000817023
GMC-Inland Div., Dayton
Dayton, Ohio 45417

Dear Mr. Jordan:

Recently, we requested you to submit a Part B application for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program.

In an attempt to coordinate the review of your application with the Ohio Environmental Protection Agency (OEPA), and striving for a simultaneous issuance or denial of Federal and State hazardous waste facility permits, we urge you to submit three copies of your Part B to OEPA at the same time it is submitted to this Agency. The mailing address for OEPA is:

Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street Box 1049
Columbus, Ohio 43216

Your direct submittal is necessary to allow OEPA to begin processing under Ohio state law. If you send copies directly to OEPA, you need send only three (rather than four) copies to USEPA.

If you have questions concerning the Ohio permitting process, please contact Mr. Paul Flanigan of OEPA at (614) 462-6303, or Mr. Bob Fragale of the Ohio Hazardous Waste Facility Approval Board at (614) 462-6981. If you have questions concerning the Federal permit process, please contact your permit-writer in this Agency, or Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-6148.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Paul Flanigan - OEPA
Bob Fragale - HWFAB

PART B DOCKET LOG

Please print

Facility GMC Inland Div, Dayton Plant

I.D. # OHD000817023

Item No.	Item Date	Description	Item Filed*
042-15	7/28/83	Statement of Basis, Draft Permit	Sec. 5
042-16	7/28/83	Public Notice	Sec. 6
042-17	9/29/83	Responsiveness Summary	Sec. 6
042-18	9-29-83	Transcript of Hearing	Sec. 6
042-19	3/19/84	Certificate of Mailing w/ mailing list	Sec. 6
042-20	3/19/84	Radio announcement voucher	Sec. 6
042-21	3/19/84	Newspaper voucher	Sec. 6
042-22	3/14/84	Verification of receipt of lib. materials	Sec. 6

*Folder 1 is arranged by sections.

CBS

PART B DOCKET LOG

Please print

Facility GMC Inland Div Dayton Plant

I.D. # OHD000817023

Item No.	Item Date	Description	Item Filed*
042-1		LOF	Sec 1
042-2	9/29/82	Transmittal from GMC to USEPA	Folder 2
042-3	10/22/82	Letter: William H. Meier to Paul Flanagan	Sec 2
042-4	11/12/82	Letter: Paul Flanagan to Kathy Homer, with encl	Sec 2
042-5	11/12/82	Internal Checklist	Sec 4
042-6	12/2/82	Letter: William H. Meier to Howard Jordan, with encl	Sec 2
042-7	12/14/82	Trip Report	Sec 3
042-8	1/14/83	Phone memo: CB Flanders to Don Cordts	Sec 2
042-9	1/26/83	Letter: Howard Jordan to William Meier, with encl	Folder 2
042-10	2/16/83	Letter: Paul Flanagan to K. Homer	Sec 2
042-11	3/18/83	Letter: W. Meier to H. Jordan	Sec 2
042-12	3/18/83	Letter: W. Meier to T. Creaghan	Sec 2
042-13	6/29/83	Letter: P. Flanagan to D. Mayhan, w/Encl	Sec 2
042-14	6/29/83	Phone memo: CB Flanders to H Jordan	Sec 2

*Folder 1 is arranged by sections.

OHIO RCRA
PERMIT PROCESS

PART B DOCKET LOG

Please print

Facility GMC INLAND DIV, DAYTON PLANT

ID # OHD000817023

Item #	Item Date	Description	Item Filed *
042-23	7/10/90 (?)	NOD LETTER TO GMC FROM OHIO EPA	SEC 2
042-24	9/4/90	GMC RESPONSE TO COMMENTS	SEC 2
042-25	1/22/91	NOD FROM OEPA INCLUDING TA CHECKLIST	SEC 2/4
042-26	3/20/91	LETTER TO USEPA WITH GMC RESPONSE TO OEPA COMMENTS ATTACHED	SEC 2
042-27	6/03/91	LETTER TO USEPA WITH GMC RESPONSE COMMENT TO OEPA COMMENTS ATTACHED	2
042-28	10/02/91	OEPA REVIEW COMMENTS SENT TO GMC DELCO	2
042-29(2)	10/02/91	OEPA COMPLETENESS AND TECHNICAL REVIEW CHECKLIST	4
042-29	1/02/92	LETTER FROM GMC TO STATE ANNOUNCING CLOSURE OF DELCO PRODUCTS DIVISION	2

* Folder 1 is arranged by sections.